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PHASE I ENVIRONMENTAL AUDIT

Penn Plaza
1727 Pennsylvania Avenue
Bremerton, Washington

MR. PAUL MCCONKEY

USEPA SF



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ENVIRONMENTAL ASSOCIATES, INC.

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September 30, 1997

JN 7328

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First Mutual Bank
400 108th Street Northeast
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Subject: PHASE I ENVIRONMENTAL AUDIT
Penn Plaza
1727 Pennsylvania Avenue
Bremerton, Washington

Ladies and Gentlemen:

Environmental Associates, Inc., (EAI) has completed a Phase I Environmental Audit of the subject property located in Bremerton, Kitsap County, Washington. This report, prepared in accordance with the terms of our proposal dated August 22, 1997, and in a manner generally consistent with the intent and methodologies of ASTM E 1527-94 "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process", summarizes our approach to the project along with results and conclusions.

The contents of this report are confidential and are intended solely for your use and the use of your representatives. Four (4) copies of this report are being distributed to you. No other distribution or discussion of this report will take place without your prior approval in writing. Additional copies are available for a small fee.

Relying solely upon the available information reviewed or otherwise developed in the course of our study, it would appear that the following conditions of potential environmental significance are present at the subject property

- The property has historically been investigated by WDOE for several reasons including the presence of drums of unknown materials at Lee Fabricators, uncontrolled sandblasting grit and the former presence of a coal gasification plant north of the site. A file is maintained at WDOE offices regarding the subject property, which includes properties located to the north and south, as well as the subject property. The subject site as defined herein is not currently listed as a site of suspected or confirmed contamination; however, no soil samples have apparently ever been obtained and analyzed from or beneath the site;



- Unknown/unassessed impacts (if any) relating to the former presence of a coal gasification plant immediately adjacent to the site on the north, and partially covering a portion of the subject property as defined to us by Mr. McConkey. Soil samples obtained north of the adjacent former bulk fuel facility suggest the presence of polynuclear aromatic hydrocarbons (PAHs) in concentrations well in excess of the cleanup levels published in the Model Toxics Control Act (MTCA), Chapter 173-340 WAC at this adjacent site;
- Fuel unloading docks partially or fully formerly located along the northern drive across the property that were adjacent to the former bulk fuel facility located adjacent to the property on the north. The potential for impacts to soil and/or groundwater possibly resulting from overfill and or spillage at these facilities is unevaluated and hence is unknown;
- The reported presence of a fuel pipeline across the northern property that, according to notes in the WDOE records, had an incidence of a "major" leak or spill;
- The presence of at least three unlabeled 55-gallon capacity drums on the property of unknown origin and contents located beneath the loading dock of building B-1;
- Sheet vinyl flooring suspected to possibly contain asbestos;
- The potential for the presence of PCBs in ballasts in fluorescent lights,
- Unknown type, capacity and/or location of fuel storage facilities for at least four historic oil-fired heating systems at the site at buildings B-2, B-3, B-5, and B-7. Potential impacts (if any) from such facilities remain unassessed/unknown, and;
- Unknowns relating to the composition and/or leachability of uncontrolled sandblasting grit at Lee Fabricators.

Momentarily excluding the above-noted conditions, it would appear that the property is free from contamination by potentially hazardous, dangerous, or toxic materials. In the current use and condition, the sheet vinyl suspected to possibly contain asbestos and the fluorescent light ballast issues present no threat to public health or the environment. No action or further study would be required at this time under current state or federal regulations.

Several of the remaining issues may be assessed by completion of soil and/or groundwater sampling and analysis. Acknowledging the limitation that no direct examination of subsurface soil and/or groundwater conditions in these areas has been made, no conclusions regarding possible impacts (if any exist) are made here. If a higher degree of confidence is desired by the owner and/or lender, subsurface sampling and testing in the form of a combination of soil/groundwater borings, test pits, and surface "grab" sampling could be employed to make a site-specific determination.

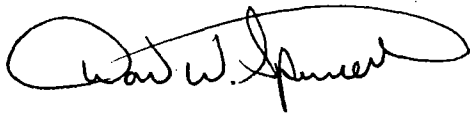
Mr. Paul McConkey
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Common sense recommendations leading to fumre management or diligent evaluation of the issues described here are offered for your consideration in the Conclusions/Recommendations section of the attached report. the choice as to whether or not to implement such recommendations clearly lies with the owner and/or lender, depending upon their individual risk tolerances.

We appreciate the opportunity to be of service on this assignment. If you have any questions or if we may be of additional service, please do not hesitate to contact us.

Respectfully submitted,
ENVIRONMENTAL ASSOCIATES, INC.



Don W. Spencer, M.Sc., P.G., R.E.A.
Principal

EPA-Certified Asbestos Inspector/Management Plamer
I.D. # AM 48151

EPA/HUD Certified Lead Inspector (Licensed)

Registered Site Assessor/Licensed UST Supervisor
State Certification #947458636

License: W000010 (Washington)
License: 11464 (Oregon)
License: 876 (California)
License: L-5195 (Illinois)

PHASE "1" ENVIRONMENTAL AUDIT

Penn Plaza
1727 Pennsylvania Avenue
Bremerton, Washington

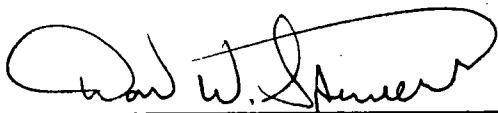
Prepared for:

Mr. Paul McConkey
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400 108th Street Northeast
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Questions regarding this investigation, the conclusions reached and the recommendations given should be addressed to one of the following undersigned.



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Environmental Geologist
EPA-Certified AHERA Building Inspector
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Reference Job Number: JN 7328

September 30, 1997

ENVIRONMENTAL ASSOCIATES, INC.

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METHODOLOGY/SCOPE OF WORK

Our study approach consisted of completing a series of investigative tasks intended to satisfy the level of effort often referred to as "due diligence" by the "innocent purchaser" in the context of the Superfund Amendment and Reauthorization Act of 1986 (SARA), and nearly identical requirements set forth in the Model Toxics Control Act (MTCA), Chapter 70.105 D (Section 040) RCW pertaining to standards of liability. The objective of a Phase I audit is to minimize potential future liability for environmental problems by demonstrating that at the time of acquisition or refinancing, the owner, buyer, or lender had no knowledge or reason to know that any hazardous substance had been released or disposed of on, in, or at the property.

In an effort to evaluate condition and previous uses of the property in a manner consistent with good commercial and customary practice and in general accordance with methods outlined under ASTM E 1527-94 "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process", our scope of work for this study included:

- Review of chronology of ownership and site history using the resources of the Kitsap County Assessor's Office, business directories from several time periods, and aerial photography from several time periods as primary resources. This included an attempt to identify possible former industries or uses presenting some potential for generating waste which may have included dangerous or hazardous substances as defined by state and federal laws and regulations.
- Acquisition and review of available reports and other documentation pertaining to the subject site or nearby sites.
- Review of Kitsap County Health Department documents, along with review of WDOE's statewide landfill listing, regarding current and abandoned landfills.
- Review of the current EPA Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), the EPA National Priority List (NPL), the EPA Resource Conservation and Recovery Act (RCRA) Notifiers, and Emergency Response Notification System (ERNS) lists of sites which are potentially contaminated or which produce hazardous substances as a normal part of their commercial operation in the vicinity of the site.
- Review of the current Washington Department of Ecology (WDOE) listing of underground storage tanks (USTs) along with the WDOE's Leaking Underground Storage Tank (LUST) listing for WDOE-documented leaking USTs in the vicinity of the subject property.

- Review of the current WDOE Confirmed and Suspected Contaminated Sites (C&SCS) listing of confirmed and potentially contaminated sites which have been the subject of hazardous waste investigation and/or cleanup activity in conjunction with the Washington Model Toxics Control Act (MTCA) Chapter 173-340 WAC.
- Risk evaluation for natural-occurring radon.
- A reconnaissance of the subject property (including buildings) and neighboring areas to look for evidence of potential contamination in the form of soil stains, odors, asbestos, vegetation stress, discarded drums, discolored water, careless manufacturing or industrial practices, etc.
- Preparation of a summary report which documents the audit process and findings.

FINDINGS

GENERAL DESCRIPTION

The subject property includes an irregular-shaped parcel covering approximately 2.24 acres of land. Improvements to the property include several metal and wood-framed buildings which were reportedly erected between approximately 1934 and 1976. Additional improvements include asphalt paving over the remainder of the property and a shed covering for metal storage. Currently the property is occupied by several companies as described in the following table. The approximate location of the site is shown on the Vicinity Map, Plate 1, appended herewith.

Building Information & Site Occupants				
Building	Units	Year Built	Square Footage	Occupant
B-1	-	1959	6,000	Currently vacant, soon a propeller repair facility
B-2		1953	7,200	Baird Weber Electric, Offices of Lee Fabricators, SoundCom.net
B-3		1934	10,400	Self-storage and offices upstairs, Ablitt Metal Fabricators
B-4	-	1975	2,400	Pacific Coast Energy truck repair facility
B-5	-	1974	2,400	Lee Fabricators paint booth & sandblasting
B-6	A, B, C	1935	2,262	Lee Fabricators
B-7	-	1935	4,320	Lee Fabricators

Building Information & Site Occupants				
Building	Units	Year Built	Square Footage	Occupant
B-8	-	1935 & 1951	3,090	Lee Fabricators
B-9	-	1935?	1,500	None - destroyed by storm damage December 1996 (Lee Fabricators)
B-10	-	1935?	2,520	Lee Fabricators
B-11	A-G	1934 & 1944	9,800	A, B - Storage for racing autos
				C, D, E - Piston ring storage
				F, G - Engine repair & Engine repair classes
B-12	-	1951	1,080	None - destroyed by storm damage December 1996

The following buildings are of wood-frame construction: B-3 (has sheet metal siding), B-6, B-7 (has sheet metal siding), B-8 (has sheet metal siding), B-10, and B-11 (has some metal siding). Buildings B-1 and B-2 are of concrete block construction, with some areas that are wood-framed or have one exterior wall that is metal-sided. Buildings B-4 and B-5 are metal-framed with sheet metal siding, and the destroyed buildings B-9 and B-12 were formerly of metal construction with sheet metal siding. All buildings have concrete slab foundations with no basements present on the property.

The building is located in a dominantly residential area approximately one mile north-northwest of downtown Bremerton, Washington. Photographs reflecting the character of the subject property are provided with this report as Plate 2 through Plate 5. A brief description of land use on nearby parcels is provided below. Plate 6, Site Plan, depicts the setting of the subject property and adjacent sites.

North: The subject site is bordered on the north by a storage facility for boat parts, and various metal materials with "poor" housekeeping. Currently there is only a mobile home that sits on top of the retaining walls that formerly contained four large above ground storage tanks for a bulk fuel facility. West of this is another retaining wall formerly containing six above ground storage tanks for the same bulk fuel facility. Further north is a steep slope down to Port Washington Narrows. Adjacent to the site along the northern property west of the former bulk fuel plant is a large area used for storage of boats and materials. Housekeeping is "moderate" at this facility, although drums were formerly stored at this site. Again, north of this area is a slope down to Port Washington Narrows. Northeast of the site is Pacific Coast Energy, a bulk fuel distributor. To the northwest is a former bulk fuel facility that is currently vacant, and all above-ground fuel tanks have been removed. A pier is located north of the site that was formerly used for unloading fuel from barges for distribution to all of the current and former bulk fuel facilities. A pipeline reportedly is buried beneath the area currently occupied by buildings B-4 and B-5 on the subject site. Far to the northwest is the Port Washington Marina parking area.

- East: The site is bordered on the east by a residential area.
- South: The site is bordered on the south by a residences along the eastern boundary, and by a boat storage/mini-storage facility that was formerly a concrete plant. Further south is a residential area.
- West: The site is bordered on the west by a residential area.

According to the City of Bremerton zoning Department, the subject property is zoned as BP, business park. Much of the current manufacturing at the site has been grandfathered into the current zoning.

GEOLOGIC SETTING

Physiographically, the site is situated on a gently rolling elevated plain which was formed during the last period of continental glaciation that ended approximately 13,500 years ago.

Published geologic maps for the site vicinity (Deeter, J.D., 1979) suggest that much of the material underlying the subject site is glacial till, a dense heterogenous mixture of silt, sand, and gravel. Typically, the till exhibits relatively low vertical hydraulic conductivity which frequently results in formation of a "perched" water table along it's upper contact. The "perched" water table (if present) is frequently seasonal and derives recharge primarily from infiltration of precipitation through more permeable overlying soils.

Topographically, the site is situated on a gentle north-facing slope approximately 40 to 50 feet above sea level. The southern three-quarters of the site is generally level, with a slightly steeper slope at the extreme northern property line as defined to us by Mr. McConkey. Based upon inference from topography and local drainage patterns, it appears that shallow-seated groundwater (if present) in the vicinity of the subject property may flow in a north to north-northeasterly direction. A copy of the U.S. Geological Survey 7.5 minute topographic map depicting the subject site is attached to this report as Plate 7.

Although no site specific information has been developed by our firm with respect to depth to groundwater at this site, our experience in the area suggests that "perched" groundwater (if present) beneath the site may lie at a depth of approximately 10 to 20 feet or tuore beneath the ground surface.

With respect to surface water resources, Port Washington Narrows is located approximately 300 feet north from the site.

DEVELOPMENT HISTORY AND LAND USE

Sources reviewed for information on site and area development and land use included the resources of the Bellevue Public Library, Kitsap County Assessor's Office, and aerial photographs of the subject property and surrounding area from several time periods. Please note that at the time of our site visit and research, the Bremerton-Kitsap Regional Library was closed for remodeling through October 1, 1997, thereby removing the potential historical information resource.

Aerial photographs of the area were reviewed for the years 1946, 1963, 1971, 1977, 1985, and 1993. The following paragraphs provide an interpretive summary of our observations in each photo. The time interval between the various historic aerial photographs selected for this particular project is, in our opinion, entirely adequate for the intended purpose, which was to permit a general assessment of overall development and land use in the vicinity of the subject property.

- 1946 Referring to the Site Plan, Plate 6, the subject site is developed with the current buildings B-3, B-6, B-7, B-10 and the western portion of B-11. Residences are located in the current location of buildings B-1/B-2 and the current parking area. The property to the south appears to be used for storage, possibly drums, and appears to include a small portion of the subject site currently occupied by building 11. Surrounding properties to the east, south and west are residential and remain residential in all photographs reviewed below. The western six-tank retaining area adjacent to the site along the north is visible, and is the former tank farm to the northwest. A former coal gasification plant is located adjacent to the property along the west side of the northern edge of the property. The approximate location of the buried pipeline serving all of the current/former tank farms in the area is visible as a lighter colored area in the approximate location of southern edge of the current buildings B-4 and B-5. No above-ground tanks appear to be located along the northern property boundary as currently defined, but the area currently occupied by building B-4 and B-5 is obviously a part of the coal gasification plant. The area around the gas plant is very dark and stained, and the area east of the above ground tanks is also dark, and possibly stained. Sheds covering former truck unloading facilities are present on the subject site and adjacent tank farm property to the north as indicated on the Site Plan, Plate 5.
- 1963 The current buildings B-2, B-1, B-8, and B-9 have been constructed on the property, but the residence noted above in the current parking area is still present. The current tank farm to the northeast has been constructed, and the small four-tank retaining area is now adjacent to the site at the extreme northeast corner. Additional horizontal above-ground tanks are now present and definitely lie on the extreme northwestern portion of the site, and a small retaining wall is located at the southwest corner of these above-ground tanks. A drop in elevation of approximately 5 to 10 feet is present at the current south edge of building B-4, otherwise, the coal plant appears much as in 1946, with the noted additions. The current tank farm of Pacific Coast Energy is now present to the northeast, and the former concrete plant is located south of the site in the area noted above as being used for storage. The plant appears to be in-use as a concrete plant.

- 1971 No tuajor changes to the site or surrounding area were noted, except there appears to be a structure now replacing three or four of the horizontal above-ground tanks near the current buildings B-4 and B-5.
- 1977 The subject site is developed with all current buildings, including the two buildings destroyed in winter of 1996/1997. No above ground tahks are located at the coal gasification plant to the north, although the plant structures farther north are still present. Adjacent properties to the northeast, east, south, west, and northwest appear similar to the previous view. The concrete plant to the south appears to have much storage, possibly including many drums, located at the northern edge of the site along the southern subject property boundary.
- 1985 The subject site appears much as it does now, although less material appears to be stored in the central parking/storage area. All of the coal gasification plant structures formerly present to the north have been removed, and this area appears to be used for drum storage. The apparent drum storage to the south of the site is no longer present. No other significant changes were noted in the immediate vicinity of the site.
- 1993 Again, the subject site appears similar to its current appearance, with sandblasting grit is visible all over the open area between buildings B-5 and B-4, and spreads extensively onto the property to the north. Roofs of buildings B-1 and B-2 appear to have been re-tarred. The above-ground tanks to the north and northwest at the bulk fuel facilities have been removed. The property to the south no longer appear to be an operational concrete manufacturer. No other significant changes appear to have occurred at other properties in the immediate vicinity.

PROPERTY CONVEYANCE/OWNERSHIP DATA

From the file resources of the Kitsap County Assessor's Office, and resources of the Bellevue Public Library, the following limited history of ownership spanning over 32 years has been established:

Instrument	Owner	Date of Purchase
Unknown	Theodore and Marian Blomberg	Prior to 1965
Statutory Warranty Deed	F. Paul and Margaret M. McConkey	August 1, 1985

According to resources available at the Bellevue Public Library and aerial photograph review, the subject property was developed with the current building B-3 in approximately 1934. Additions were made to the property shortly afterward including buildings B-6, B-7, B-8 and B-10 (which may have been replace in 1967 according to assessor's documents). By 1942, building B-9 had been constructed, and by approximately 1955, building B-8 was completed to its current configuration. By 1953, building B-2 was added to the property, and in 1959 building B-1 was added to the property. Before approximately 1960, building B-12 was completed at the

site. Finally, in approximately 1976, buildings B-4 and B-5 were added to the site. Borrowing from the jargon of ASTM, no "reasonably ascertainable" or "likely to be useful" information prior to 1934 was available. The absence of such information has no material effect upon the conclusions of this report.

Please note that the northwest corner of the property was formerly a portion of Western Gas Company's Coal Gasification Plant. The structures that were developed on this portion of the site included several "gas holders" of at least 15,000 cubic feet each. At least three very small tanks were also located in this area, although we are unsure of the purpose of these tanks. Also, two fuel unloading sheds were located along the drive at the northeastern corner of the property.

All developments at the site were constructed for Lent's, Inc., a sheet metal, plumbing, and electrical service and manufacturing contractor. According to Mr. McConkey, this business failed in the time span of approximately 1980 to 1985, when Mr. McConkey purchased the property. Many of the current businesses at the site are owned by former employees of Lent's, Inc.

Sanborn Maps depicting the subject property are only available for 1928 with updates through 1942, which depict only buildings B-3, B-6, B-7, and B-10 on the site. No information concerning underground storage tanks was found on the Sanborn Maps. Sanborn atlases prior to 1928 do not include the subject property, as it was not within the city limits of Bremerton prior to that time. A copy of the Sanborn map page depicting the subject property is provided as Appendix A. Additionally, informational materials and photographs regarding the site provided by Mr. McConkey are attached as Appendix B.

Building permits were on-file for only the two newest structures at the site, buildings B-4 and B-5. Building B-4 was constructed in June of 1975, while B-5 was constructed in August 1974. Several business permits were also on file. Lent's sold the sheet metal plant to ABCO Mechanical in 1985, which was purchased by Ablitt in 1993. Baird Weber electrical contractors obtained a certificate of occupancy in 1991, although they apparently occupied the site prior to that time. VGR Home Heating was given a certificate of occupancy in May 1986, and although the nature of their business is unknown, it would appear that they were a heating repair contractor. CLM Pet supply occupied building B-1 from November 1994 through this past year. Oasis technologies computer repair and supplies received a Certificate of Occupancy (C of O) in July 1994. Washington Interior Services carpet and upholstery received a C of O in March 1991, and Adart, a graphics company, received a C of O in 1988. The current occupant SoundCom.net occupied the property in April 1996. With the exception of Lee Fabricators, Baird Weber, and Ablitt Metal, all of the occupants noted above were located in buildings B-1, B-2, or upstairs in building B-3.

In summary, the lower floor of building B-3 has been a sheet metal shop since 1934, and the upper floor of building B-3 have been offices or storage since that time. Building B-4 has been a truck repair facility since approximately 1975, when it was moved from building B-5, which was the truck repair facility for only one year when it moved from another location possibly in building B-6, B-9, B-10 or B-11. Building B-5 became a painting facility in approximately 1975

when the truck repair facility was moved, and it is suspected that the paint booth currently used a shed for sandblasting was constructed immediately north of building B-5. Building B-6 was formerly used for parking service vehicles for Lent's, Inc., but became a storage area over time. Building B-7, B-8 and B-9 have been used for welding and pipe cutting activities since their construction. Building B-10, B-11 and B-12 have been used for general storage since their construction. It is not known when the pipe shed was constructed, although it appears likely from Assessor's Office records that it was built in approximately 1970.

Kitsap County Assessor's file resources suggest that buildings , B-3 and B-8 were heated by an "oil burner", and that buildings B-1 and B-2 were heated by a steam/hot water radiant floor heater. A boiler was present at the time of our site visit along the south wall of building B-2, and a smokestack was present between buildings B-6 and B-7, suggesting that a boiler was located behind the bathroom at this locality, which was confirmed by site employees of Lee Fabricators. We were unable to access this area due to obstructions including an shed for an air compressor and a sink. The employee stated that the boiler had not been used for several years (over 10).

We contacted Mr. Scott Rapleye of the Bremerton Fire Marshall's Office with regard to the presence of underground storage tanks for fuel for the boilers at the site. He stated that he has no records pertaining to underground tanks, but that no permit for removal of any underground tanks had been filed with his office. During our site reconnaissance, no features suggestive of underground tanks were noted at the site in the vicinity of the boilers, such as filler caps, vent lines, patched asphalt near the boilers, etc. It is conceivable that the storage facilities for the fuel for the boilers was an above-ground or below-ground system.

SITE RECONNAISSANCE

An environmental geologist/EPA-certified Asbestos Building Inspector from our firm visited the property on September 5, 1997 to review on-site conditions and land use practices in the surrounding area. Mr. Paul McConkey, owner of the property, provided access to the building and grounds. The representative areas reviewed during our site visit included the building B-3 units A, B, C, D, G, H, I, K, and the first floor manufacturing area of Ablitt Metal Fabricators (sheet metal fabrication such as ductwork), building B-4 occupied by Pacific Coast Energy's truck repair and maintenance facility, building B-5 occupied by Lee Fabricators painting facility, the sandblasting area north of building B-5 (former paint booth), Building B-6 occupied by storage for Lee Fabricators, buildings B-7 and B-8 occupied by the main cutting and welding area for Lee Fabricators, building B-10, buildings B-1 and B-2. We were unable to enter building B-11 due to the fact that these areas are leased to private parties for storage or auto repair as noted previously.

The subject property includes several vintages of building of varying construction types as noted earlier. The roofs of buildings B-1 and B-2 are flat and built-up in design, while the remaining buildings are pitched. Paved parking areas are located on areas of the property not occupied by buildings, and a small part of the extreme northern portion of the property may be un-paved;

however, the extensive cover of sandblasting grit obscured actual observation of the ground surface in this area. Typical building materials and/or conditions observed during our site reconnaissance included:

- Floors are concrete, typically bare, although covered with carpet in office areas, or are wood covered with carpet in the upper floor of building B-3.
- Interior walls throughout the building are unpainted or painted sheetrock, wood, concrete block, or sheet metal.
- Ceilings are exposed rafters and trusses, painted sheetrock or suspended cellulose panels.
- Incandescent and fluorescent light fixtures were noted throughout the building.
- Most buildings are unheated, although building B-3 has an HVAC system that is electric and natural gas. As noted earlier, a boiler was noted in building B-2, and an area for a boiler was noted west of the bathroom that is present between buildings B-6 and B-7.
- Fiberglass insulation was evident in several of the buildings.

Business-specific observations at each building are provided below. Additional information regarding the site, particularly Lee Fabricators, may be found in Appendix C.

Building B-1 - Former CLM Pet Supply

This building was being cleaned up for imminent move-in by a propeller repair company, the company name of which Mr. McConkey could not remember at the time of our site visit. Prior to CLM Pet Supply, the site was occupied by a heating contractor, and was formerly utilized by Lent's as their lighting fixture showroom and retail sales area. This building had painted concrete block walls, and a carpeted office area with sheetrock walls. Heating to the building is supplied by roof-mounted HVAC systems. At the rear of this building is a closed-in (by sheet metal) loading dock, beneath which we identified approximately three drums containing unknown materials (see Plate 5). We were unable to move these drums for access, therefore we were unable to inspect their contents. The drums were unlabeled.

Building B-2 - Current and Former Electric Contracting Business

This is occupied by SoundCom.net, Baird-Weber Electric, and the offices of Lee Fabricators. The rear (west side) of the building was utilized by Baird Weber for storage of various electrical contracting materials such as wire, electrical piping, fixtures, etc. No storage of potentially hazardous materials were noted in this building. The building formerly was heated by a radiant floor heater with a boiler located along the southern wall of the building. No asbestos materials were noted on the boiler or piping leading from the boiler, but it is not known where oil storage for this formerly oil-fired heating system was located. A boiler inspection certificate from the Washington Department of Labor and Industries was noted and dated 1978, suggesting that was

possibly the last time the boiler was operational. Currently the building is heated by an HVAC system. Ceiling tiles in this building were affixed and suspended cellulose panels. Walls are sheetrock and floors are carpeted or bare concrete.

Building B-3 - Ablitt Metal and Offices

Ablitt Metal occupies the lower floor of the building and performs the same type of business as Lent's did during its occupancy, sheet metal fabrication, mainly HVAC ductwork. No potentially hazardous materials were noted at this operation, but large computer controlled sheet metal cutting and shaping machines are present that use hydraulic oil. No significant staining was observed on the concrete floors beneath these machines. The exterior of the building is painted sheet metal, with wood-framed walls and ceiling. The interior of the building is unfinished, except on the second floor, where walls are sheetrock or exposed wood and/or metal, with a wood floor covered with carpet in office areas. Only two tenants are present on this floor, the business offices of Dennis Piehl and Mr. McConkey. A storage room we reviewed contained over-the-counter-type paint, paint thinners, and general cleaning supplies in de minimis quantities.

Building B-4 - Pacific Coast Energy Truck Repair and Maintenance Facility

This building is exposed sheet metal with metal framing, and painted on the exterior. The interior is unfinished fiberglass insulation. We spoke with the facility manager, Mr. Jeff Huer, who stated that he had worked at the site for approximately 13 years, and had "no problems" with his operations. He stated that waste oil produced at the site is recycled by ARCOM, and that the operation produces approximately 110 gallons every 3 months or so. A parts washer serviced by Safety Kleen containing mineral spirits (naphthalene) was noted along the east wall of the shop. No evidence of spillage was observed in the area around the parts washer. Material Safety Data Sheets were noted on the north wall of the shop and were accessible to all employees. According to Mr. McConkey, waste oil is used to heat the building, and an approximately 200-gallon capacity above-ground storage tank was noted at the west entrance bay to the building which reportedly contains the waste oil for heating. Excess waste oil is apparently recycled through ARCOM. Three labeled drums, two of which contained "fresh" oil were noted along the west side of the building, while the other drums was plastic and empty (see Plate 4). The drums appeared to be properly labeled and were closed; however, no secondary containment of shed covering was present. We would recommend placing the drums inside the facility and consideration of secondary containment of these materials, as well as for the above ground storage tank. Several shipping containers were noted north of this building, and several Pacific Coast Energy trucks were parked along the east side of the building. A storm drain was also noted along the drive to the east of the building adjacent to the former bulk fuel facility that represented the former fuel loading facility according to Mr. McConkey.

Building B-5 - Lee Fabricators Sandblasting and Painting Operation

This building was of similar construction to building B-4. It is occupied by the painting facilities of Lee fabricators, and sandblasting is carried out in a former paint booth located north of the site and all along the area between building B-4 and B-5. Sandblasting grit covered the ground between the two buildings to thicknesses approaching six inches or more, and approximately one to two feet of sandblasting grit was noted in the former paint booth. Referring to Plate 4, a metal wall retains most of the grit during precipitation events although a small break was noted at the northwest corner of the property where a small amount of grit washes onto the adjacent property to the north. This entire area of the northwest corner of the property appears to be structural fill material based upon aerial photograph review compared to observations made during our site reconnaissance. At the time of our site visit, an employee was painting in building and was wearing a respirator; however, no venting system was noted in the building. The building was reportedly formerly heated by an oil-fired system; however, it is no longer heated.

We contacted Ms. Stella Nehen of the Puget Sound Air Pollution Control Agency (PSAPCA) on September 24, 1997 in an effort to determine if the painting facility was registered. She stated that no file is present for Lee Fabricators; however, a file is present for Lent's, Inc. The site came to PSAPCA's attention after an anonymous party complained about the sandblasting operation using "copper slag" in 1991. At that time a boiler was noted on-site (in building B-7), which of apparently of some concern since it was oil-fired and may have had adverse emissions. According to her file information, Ms. Nehen stated that the boiler was disassembled in the mid-1980s, and that it appears that the site was "grandfathered" in at that time. No information regarding the painting operation was contained in the file, and the sandblasting operation was of no concern to PSAPCA since very little dust is generated by the sandblasting. It is unknown whether or not the painting operation would be required to be permitted under PSAPCA regulations, as it is not known how much painting is carried out at the site.

We noted several small (approximately 20-gallon capacity) containers of methyl ethyl ketone (MEK) that is used as a thinner and cleanser for the airbrush guns in the interior of the building. Several containers of primer in 5-gallon cans was noted, and much paint and thinner is stored in a metal enclosure at the southeast corner of the building. This storage appears to be sufficient and in compliance with fire department regulations, and appeared to have relatively "good" housekeeping practices. According to Darrell Lee, owner of Lee Fabricators, Inc., the spent paint sludge and thinner produced from airbrush gun cleaning is disposed of through Sol Pro. Approximately 55-gallons is disposed of approximately every 6 months. Mr. Lee stated that to the best of his knowledge, he is not required to have a permit for his painting facility through the Puget Sound Air Pollution Control Authority, as they have visited his site, and did not require a permit at that time. Mr. Lee also stated that the fuel storage facility for the former boiler in building B-8 is underground, but that he could not identify its location.

Additionally, we interviewed Mr. Lee for information regarding the electroplating business that reportedly was at the site according to WDOE files. He stated that it is located centrally in the southern building (building 11). We are unable to comment on this facility, as it has not been permitted through Bremerton Business License, nor were we able to access this building at the time of our site visit.

Building B-6 - Storage for Lee Fabricators

This building is also one of the oldest at the site along with buildings B-3, B-7 and B-8 and is of wood-frame construction. Units A and B located along the north end of the building are mini-storage areas; however, it appeared that no internal walls are present to separate one unit from another in this building. Unit C at the south end is utilized by Lee Fabricators for a small welding electrode stabilization oven, and a 30-gallon capacity drum of gear oil was present in this unit. Several 5-gallon capacity containers of motor oil were also present in this unit, and a 55-gallon capacity drum of hydraulic fluid was noted. No significant staining was noted on the concrete floor of the unit. General storage of various materials covered with a plastic tarp was noted in the remainder of the building. The building was heated by an overhead natural gas heater.

Building B-7 - Lee Fabricators Main Shop (and building B-8)

This building serves as the main layout, cutting and welding facility for Lee Fabricators, and is of wood-frame construction with sheet metal walls, and minor areas of sheetrock. The welding done is mainly arc welding of various types, with cutting performed with torches. Gas cylinders acquired through Oxygen Sales are stored in a small shed located to the north of the building west of the large shed noted on the Site Plan, Plate 6. A large air compressor is located at the northwest corner of the building in the reported former location of the boiler that provided radiant floor heating to the building in the past. We also inquired of a 17 year employee of Lee Fabricators/Lent's, Mr. William Radford, who stated that he does not remember when the boiler was removed, but that the boiler was never used during his employment at the site, and he didn't remember where the oil storage was for the system, nor whether it was above-ground or below ground. Building B-8 is an extension of the shop area, and is similar to building B-7 in use and appearance.

Building B-9 - Former Lee Fabricators Building (destroyed in December 1996)

All that remains of this building is the west, south, and east walls and the steel structural beams and joists. The building was destroyed during the last week of 1996 due to the weight of rain saturated snow. The building was formerly utilized by Lee Fabricators for miscellaneous storage.

Building B-10 - Storage for Lee Fabricators

This building was not accessible due to the presence of a locked chain-link fence; however, visual observation was possible, and the building was of metal frame construction with sheet metal walls. The building housed a truck and miscellaneous materials at the time of our site visit.

Building B-11 - Three Occupants

Building B-11 is utilized as rented storage space, and we were unable to reviewed interior conditions with the exception of peering through a crack at units C, D, and E, which is occupied by what Mr. McConkey says is the worlds largest collection of piston rings. According to Mr. McConkey, no hazardous materials are in-use at this facility, rather, it is a distribution warehouse only.

Units A and B are occupied by a engine repair facility that is operational sporadically. According to Mr. McConkey, the occupant holds classes through Olympic College on Engine Repair. We were unable to access these units. Similarly, we were unable to access units F and G, which according to Mr. McConkey is occupied by an automobile racer. Activities are not known at these units. Peering through a crack, we noted that a small fishing boat was stored in unit F.

As noted by Mr. Lee earlier in the report, an electroplating operation is present in one of these units. Again, we are unable to comment on activities at this locality at this time, as we were not provided information regarding this operation, nor were we able to access it at the time of our site visit.

Building 12 - Storage (destroyed in December 1996)

This building was completely gone at the time of our site visit, but was reportedly leased for private storage. Similar to Building B-9, the building was destroyed by rain saturated snow during the last week of December 1996.

In summary for this section, according to Mr. McConkey and Mr. Lee, to the best of his knowledge, there are no above or below-ground fuel storage tanks on the property. No evidence to suggest the presence of underground fuel storage tanks (i.e., vent lines, filler caps, etc.) was noted on the property. Similarly, no water wells or groundwater monitoring wells were noted on the property. At the time of our visit, no stains, odors, or unusual vegetation conditions that might otherwise indicate the potential presence of hazardous materials were observed on the subject property.

CHECK FOR PCB-CONTAINING MATERIALS

Prior to 1979, polychlorinated biphenyls (PCBs) were widely used in electrical equipment such as transformers, capacitors, switches, fluorescent lights (ballasts) and voltage regulators owing to their excellent cooling properties. In 1976, the EPA initiated regulation of PCBs through issues pursuant to the Toxic Substances Control Act (TSCA). These regulations generally control the use, manufacturing, storage, documentation, and disposal of PCBs. EPA eventually banned PCB use in 1978, and adoption of amendments to TSCA under Public Law 94-469 in 1979 prohibited any further manufacturing of PCBs in the United States.

- Light Fixtures** In an effort to enhance the thoroughness of our review, we inspected representative fluorescent light ballasts in the building to ascertain if the ballast labeling addressed PCB content. Inspection of the representative lighting revealed that the ballasts were manufactured by Advance Transformer Company and were not definitively marked with respect to PCBs. Based upon the absence of definitive labeling, we conclude that some or all of the fluorescent light ballasts in the building may contain PCBs.
- Main Service
Electrical
Transformers** Three pole-mounted main-service electrical transformers were noted along the west side of building B-7, and one along the east side of building B-2. No certifications or labels regarding PCBs were noted on the transformers. Careful examination of the transformers revealed no cracks, staining, or other evidence of potential leakage. Liability for this equipment ultimately lies with the utility company in any event.

CHECK FOR ASBESTOS-CONTAINING MATERIALS

During reconnaissance of the property, we observed building materials to assess the potential for the presence of asbestos-containing materials (ACM). During our site review, one material, sheet vinyl flooring was noted in the bathroom in building B-2, was noted and is suspected to possibly contain asbestos. The flooring was in "good" condition, borrowing from AHERA, 40 CFR, part 763, and covered approximately 100 square feet. Mr. McConkey did not authorize sampling of the material.

It is important to note that our effort regarding identification of asbestos-containing materials within the subject building was a preliminary review and not an asbestos survey. Since no destructive sampling was completed for this audit, materials not readily accessible such as roofing materials and/or materials hidden behind walls, within walls (plaster/lath), or existing flooring or utility corridors were not reviewed.

RADON EVALUATION

- Occurrence** Radon is a naturally occurring, highly mobile, chemically inert radioactive gas created through radioactive decay of uranium and thorium. The potential for occurrence of radon varies widely and is dependent upon (1) the concentration of radioactive materials in the underlying bedrock; (2) the relative permeability of soils with respect to gases; and (3) the amount of fracturing or faulting in surficial materials (EPA, 1987).

Health Risks The concern regarding radon and its potential effects upon humans arises from the results of studies (EPA, 1987) which suggest that approximately fifteen percent of all lung cancer mortalities in the United States may be attributable to exposure to radon.

The EPA has established a concentration of radon of four (4) picocuries per liter (pCi/L) as a maximum permissible concentration "action level". Concentrations above this value would signal a potential health threat. According to some studies, an average concentration in homes across the United States is on the order of 1.4 pCi/L.

Risk of Potential Exposure in the Bremerton Area The Bonneville Power Administration (BPA) recently published the results of measurements for radon made in residences throughout the region they serve which includes Washington, Oregon and Idaho. For the Bremerton area in the immediate vicinity of the subject property, nine (9) tests have been performed. The results of their work (BPA, 1993) suggest that radon levels over 4 pCi/L were detected in none of the monitored residences in the vicinity of subject site. The highest reading in the township was 1.4 pCi/L. Additionally, the average listed radon reading in the subject site township was 0.82 pCi/L, well below the EPA threshold of concern.

On the basis of the findings presented in the cited BPA survey, we conclude that the potential for exposure to natural-occurring radon at the subject site is low.

WATER SUPPLY, WASTE WATER AND SOLID WASTE MANAGEMENT

Information supplied by the Public Works Department of the City of Bremerton and supported by Mr. McConkey, revealed that water and sewer services are provided by the City of Bremerton.

Several solid waste dumpsters located on asphalt were noted in the central asphalt-paved area of the property. The dumpsters, which are maintained by Brem-Air Disposal, were relatively clean and free of overflowing debris at the time of our site reconnaissance.

REVIEW OF WASHINGTON DOE LISTING OF UNDERGROUND STORAGE TANKS

Review of the current Washington Department of Ecology listing of underground storage tanks (USTs) suggests that five (5) facilities with registered USTs are located within a one-half mile radius of the subject property. Information regarding these USTs and their status is provided below:

Company & Address	Age (years)	Gal.x 1,000	Status	Hydro. Pos.*	Distance (ft) & Direction	Contents
Bremerton Public Works 1548 Warren Avenue	? ?	? 10-20	CPro CPro	X	2,800 East-southeast	Leaded gas Unleaded gas
Coca Cola 1600 12th Street	? ?	? < 1.1	CPro	U	2,100 Southwest	? Leaded gas
Kitsap Co. Central Comm. 1720 Warren Ave.	21	?	IU	X	2,500 East	?
Municipal Repair Facility 915 17th Street	? ? ? ?	? ? ? < 1.1	UK UK UK UK	X	2,300 East	? Leaded gas Unleaded gas Used oil
Olympic College 16th & Chester	? ? ? ?	? ? ? ?	EX CiP CiP CiP	X	1,700 Southeast	Heating fuel Heating fuel Heating fuel Heating fuel
Status Code: EX Exempt IU In Use UK Unknown CiP Closed in-place CPro Closure in Process						
? - Information regarding age of tanks, status, capacities, and/or content was not included for these sites in the WDOE UST list.						
* Note: "Hydro. Pos." (hydrologic position) in the table refers to the position of the USTs in relation to the subject property and the probable direction of groundwater flow. Cross (X), Down (D), and Up (U) indicate gradient direction. In general, concern arises when USTs are located up-gradient from the subject property.						

According to the most recent WDOE Leaking Underground Storage Tank (LUST) listing, two of the above-listed tank facilities located within an approximately one-half mile radius of the subject property have reported accidental releases or leakage to the WDOE in the past.

- Bremerton Public works located at 1548 Warren Avenue reported impacts to soil and groundwater to the WDOE in December 1992. Cleanup was reportedly in-progress as of June 1995. This site is hydrologically cross-gradient in relation to the subject property approximately 2,800 feet to the east-southeast.
- Coca Cola, 1600 12th Street, reported impacts to soil to the WDOE in August 1989, and reported the impacts to be cleaned up in December 1992. This site is hydrologically up-gradient in relation to the subject property approximately 2,100 feet to the southwest.

Considering the substantial separation distances and/or hydrologic positions of the above-listed tank sites in relation to the subject property as positive risk mitigation factors, it is our opinion that the potential for environmental impairment of the subject property from these sources is very low. The approximate locations of the WDOE-documented underground storage tanks within a one-half mile radius of the subject property are indicated on the Vicinity Map attached to this report as Plate 1.

EPA & STATE RECORDS OF POTENTIALLY HAZARDOUS SITES

Superfund and NPL Review of the current EPA Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) and National Priority List (NPL) listings revealed no CERCLIS and no NPL sites within approximately one mile of the subject property that have been designated as potentially hazardous or eligible for participation in the Superfund cleanup program.

MTCA The Washington Department of Ecology hazardous waste cleanup and investigation program was launched in 1989 as a part of the Model Toxics Control Act (MTCA), Chapter 173-340 WAC, in order to evaluate potential and actual hazards at sites within the state. Of the more than 630 sites currently on the Confirmed and Suspected Contaminated Sites (C&SCS) program list, eight (8) are located within a one mile radius of the subject property. These include:

- Brem-Air Disposal, 512 Sheldon Boulevard, is a site of confirmed contamination of soil, sediment, and groundwater by metals, TPH, and Volatile organic compounds. Impacts to surface water are suspected by these contaminants, and impacts to air are suspected by metals and TPH. This site has been ranked by WDOE as a "1", indicating that the site presents a relatively greater potential for impacts to health and the environment than other ranked sites, and is reportedly undergoing remedial actions. This site is hydrologically cross-gradient in relation to the subject property approximately 3,200 feet to the east-southeast.
- Bremerton School District's Haddon School, Lafayette Avenue and 15th Street, is a site of confirmed impacts to soil by metals, TPH and volatile organic compounds (VOCs). This site has not been ranked by WDOE, and is awaiting a site hazard assessment. This site is hydrologically cross-gradient in relation to the subject property approximately 3,000 feet to the west-southwest.
- The Chevron Tank Farm at the Port Washington Narrows, 1310 Highland Drive, is a site of confirmed impacts to groundwater, sediment, surface water, and soil by petroleum hydrocarbons, with confirmed impacts to sediment and surface water by metals (suspected impacts to groundwater and soil), and confirmed impacts to groundwater by VOCs. This site has been ranked by WDOE as a "2", indicating that the site presents a relatively greater potential for impacts to health and the environment than other ranked sites but less potential than sites that receive a "1" ranking. This site is undergoing cleanup by the potentially responsible properties without WDOE oversight. This site is hydrologically cross-gradient in relation to the subject property approximately 4,000 feet to the east-southeast.

- Evergreen Park located at 14th Street and Sheldon Boulevard is a site of confirmed impacts to soil by halogenated VOCs, metals, TPH and VOCs, impacts are suspected by conventional organic and inorganic contaminants. Groundwater sediment and surface water are suspected to be impacted by all confirmed contaminants in soil. This site has been ranked by WDOE as a "5", indicating that the site presents the lowest assessed risk to health and the environment than other ranked sites, and is undergoing cleanup by the potentially responsible properties without WDOE oversight. This site is hydrologically cross-gradient in relation to the subject property approximately 3,000 feet to the east.
- Lofthus Bulk Plant located at 510 Sheldon Boulevard is a site of confirmed impacts to surface water by metals and petroleum hydrocarbons, confirmed impacts to soil by petroleum hydrocarbons, and suspected impacts to groundwater by VOCs. Impacts are also suspected to air, groundwater, sediment and soil by metals, and to air, groundwater and sediment by petroleum hydrocarbons. This site has a "1" ranking indicating greatest assessed risk to health and the environment, and is awaiting remedial action. This site is hydrologically cross-gradient in relation to the subject property approximately 3,200 feet to the east-southeast.
- The Old Bremerton Gasworks located at 1725 Pennsylvania Avenue (*the subject property's address*) is a site of confirmed impacts to sediment by polynuclear aromatic hydrocarbons (PAHs), and confirmed impacts to soil by base/neutral organics, phenols and PAHs. Impacts are suspected to: groundwater by base/neutral organics, metals, petroleum hydrocarbons, phenols, and PAHs; to sediment by metals and petroleum hydrocarbons; to soil by metals and petroleum hydrocarbons; and, to surface water by base neutral organics, petroleum hydrocarbons, phenols and PAHs. This site has been ranked as a "1", indicating the greatest assessed risk to health and the environment, and remedial action is reportedly in progress. This site is adjacent to the subject site on the north, and includes the extreme northern portion of the subject property.
- The Sesko Property, 1700 (block of) Pennsylvania Avenue, is a site of confirmed impacts to soil by PAHs, and suspected impacts to groundwater and sediment by metals, petroleum hydrocarbons, and PAHs, with soil suspected to be impacted by petroleum hydrocarbons. This site has received a ranking of "1", again the greatest assessed risk to health and the environment, and is awaiting remedial action. This site is hydrologically down-gradient in relation to the subject property and adjacent to the site on the northeast.

- Ward Radiator, 407 Naval Avenue, is a site of suspected impacts to groundwater, sediment, soil and surface water by metals and petroleum hydrocarbons. This site has not been ranked, and is awaiting a site hazard assessment. This site is hydrologically up-gradient in relation to the subject property approximately 3,500 feet to the south.

Considering the (substantial) separation distance and/or hydrologic position of all sites, except the Old Bremerton Gasworks and Sesko Property sites, in relation to the subject property as positive risk mitigation factors, it is our opinion that the potential for environmental impairment of the subject property from these sources is very low. The approximate locations of the C&SCS within a one-half mile radius of the subject property are indicated on the Vicinity Map attached to this report as Plate 1.

WDOE File
Review

As noted in the previous section, at least two C&SCS sites include or are near the subject property, the Sesko Property site and the Old Bremerton Gasworks. In an effort to obtain more information regarding these sites, we visited the WDOE regional offices on September 11, 1997 to review files on these sites, as well as obtain information on-site listed generators of hazardous waste (this information found in the following section). As an interesting detail, Penn Plaza itself, and Lee Fabricators, have separate WDOE files, even though these sites do not appear on the C&SCS listing. In an effort to efficiently summarize our findings, several of the pertinent materials are attached to this report as appendices. In the following sections, a brief summary of findings of the attached materials is provided. Please note that all sites below were identified to Ecology by a Department of Natural Resources officer who was boating in Port Washington Narrows when it was reported that noted work was being performed on the shoreline without a permit. The officer noted in the complaint to WDOE that oil was observed seeping out of the ground and along the shoreline. Follow-up site visits by WDOE to this complaint at the property adjacent to the site on the North (now known as the Sesko Property) resulted in Ecology involvement at the subject site.

LEE FABRICATORS (see Appendix C)

Referring to Appendix C, Ecology has made several announced and unannounced visits to the property. Mr. McConkey did not inform us of any involvement with the WDOE during our site reconnaissance, even though he had supplied us with some information regarding the adjacent gas plant to the north. The Lee Fabricators site as defined in the WDOE files includes the subject site and areas located to the north of the property formerly a part of the former Bremerton Gasworks. Much of the machinery and operations noted in the site visits were identified by us during our site reconnaissance. Concerns noted during the Ecology site inspections included:

- Sandblasting grit spread over a large area at the north of the property. This grit was present during our site visit, and appeared no different than conditions noted in Ecology site photographs in 1992.
- Several unlabeled, uncontained, and improperly closed dmms were noted at the property west of the shops (in the courtyard as referred to in this report) and north of the sandblasting shed (not noted at the time of our site visit).
- Salmonid survey of the (clean) sandblasting grit did not result in an excessive number of fish deaths.
- A "fly-by-night electroplating operation" was formerly present on the property.
- Total metals concentrations of the sandblasting grit are possibly below the MTCA cleanup level for arsenic, below MTCA soil cleanup levels for barium, cadmium, chromium, mercury, molybdenum, nickel, selenium, and zinc, and above the MTCA cleanup level for copper using British Columbia testing methodology for total metals. Comparison using EPA-accepted methods is unknown. A copy of these test results may be found in Appendix C.
- CB Concrete, formerly operating at the property to the south of the subject site was discharging wastewater into storm drains, and possibly onto the subject site. Several dmms were also noted at this adjacent site.
- Dmms were present at several locations of Penn Plaza that contained a dark oily substance and had open lids, missing bungs, and no secondary containment or cover.
- A "gooey substance" had once come out of the storm drains located in the central parking area.
- A "major spill" had occurred at the underground fuel pipe mnnng across the drive that was identified to us by Mr. McConkey.
- A TCLP metals test for leachability of metals from the sandblasting grit was reportedly performed with all results being "low"; however, the test results were apparently never forwarded to Ecology, as the results were not in the file.
- No information more recent than approximately 1994 was present in the files.

Mr. Lee stated to us on September 24, 1997 that he had provided a copy of the results of Toxicity Characteristics Leachate Procedure (TCLP) analysis of spent sandblasting grit to WDOE as he stated he would in the WDOE file note dated May 5, 1994. Mr. Lee did not provide us with a copy of these test results, and the test resuhs were not in the WDOE file. Regardless, WDOE's lack of additional site visits and/or correspondence following 1994 the issue of the sandblasting grit no longer interests them; however, this supposition of position is not documented in WDOE files. Although the total metals test results (using Canadian methodology) would appear to be above soil cleanup

levels, the material is not soil, and would therefore not be regulated under the Model Toxics Control Act (MTCA), Chapter 173-340 WAC. As a minimum, for aesthetic reasons and in an effort to avoid the appearance of "poor housekeeping", we would recommend improved "housekeeping" to contain the spent grit inside the enclosure located to the north of building B-5. We are currently awaiting receipt of a copy of the TCLP results from Mr. Lee.

PENN PLAZA (see Appendix D)

Again, as several of these sites are related, much of the WDOE file information is duplicated in all of the files. Duplications of material presented in Appendix C are not included in Appendix D. The Penn Plaza property as defined in the WDOE files includes the former concrete plant to the south, the subject property, and also the Sesko property which is adjacent to the site on the north. Concerns noted during the Ecology site inspections at this site included essentially the same material contain in the Lee Fabricators file, with the addition of:

- A partial fax was noted in the file apparently of revisions to a report prepared by SAIC for an unknown party and dated May 16, 1995. This report apparently gave reasons for the Penn Plaza site to not be listed as a C&SCS site.
- Soil samples obtained from the property to the north (the Sesko Property site) confirmed the presence of polynuclear aromatic hydrocarbons (PAHs) in concentrations exceeding MTCA cleanup guidelines as published in the Model Toxics Control Act (MTCA), Chapter 173-340 WAC.

OLD BREMERTON GASWORKS/SESKO PROPERTY (see Appendix E)

Again, much duplication of information relating to the above two sites was present in this file. The site as defined by Ecology includes all areas that were formerly a part of the old Bremerton Gasworks located to the north of the subject property, and partially including the northwest corner of the subject property. This site was ranked by SAIC, WDOE's contractor; however, the site hazard assessment report was not in the WDOE file. No additional information not contained in the two files summarized above was present in this file.

**TSD/RCRA/
FINDS**

Review of the EPA's Treatment, Storage and Disposal (TSD) facilities listing for sites that treat, store or dispose of potentially hazardous materials revealed that no TSD sites are located within a one mile radius of the subject property.

Review of the EPA's Facility Index System (FINDS) listing revealed several sites within a one-half mile radius of the subject property which are regularly monitored by EPA/DOE for the use or generation of small amounts of hazardous substances as a normal part of their business activities. These include:

Company & Address	Generator Code
American Marine Industries, Inc. 1500 Thompson Drive	NG
Bremerton School District Freedom Middle School 1318 High Avenue	NG
Lee Fabricators, Inc. (<i>Subject Site</i>) 1725 Pennsylvania Avenue	CESQG
Olympic College Auto Tech Program 1548 Warren Avenue	SQG
Olympic College 1600 Chester Avenue	SQG
Pacific Coast Energy Companies 1702 Pennsylvania Avenue	SQG
Generator Code: SQG Small Quantity Generator, between 100 and 1,000 kilograms per month of hazardous materials. CESQG Conditionally Exempt Small Quantity Generator, less than 100 kilograms per month of hazardous waste. NG Non-regulated generator.	

Businesses named in the FINDS listing are users or generators of potentially hazardous or toxic materials as a normal aspect of their business practices. Listed businesses are required to closely monitor and report their use or generation of such materials to the EPA.

Only Lee Fabricators in the above listing is located at the subject site, and received a Generator number for removal of several barrels (dmms) that had accumulated at the property. During our site visit only a small number of containers, mostly 20-gallon cans, containing paint wastes were noted in the paint shop (building B-5). These were stored inside, but did not have secondary containment. Pacific Coast Energy also is a RCRA Generator, and is listed resulting from disposal of waste antifreeze and the parts cleaner that is serviced by Safety Kleen.

Based upon this information, upon the monitoring and reporting requirements imposed by the EPA, and upon the presumption that the above-mentioned user/generators exercise prudence in management of these materials to minimize liability and EPA penalties, it is our opinion that the potential for environmental unpairment of the subject property from these sources is very low.

ERNS Review of the EPA's Emergency Response Notification Systems (ERNS) list for the State of Washington revealed that the subject site has not reported a spill. This list has been compiled with periodic updates since October 1987.

LANDFILLS

Review of Bremerton-Kitsap County Health Department documents regarding current and abandoned landfills, along with the WDOE's statewide landfill listing revealed that there are no documented landfills located within a mile radius of the subject property.

CONCLUSIONS/RECOMMENDATIONS

As noted in the introductory letter and elsewhere in this report, relying solely upon the available information reviewed or otherwise developed in the course of our study, it would appear that the following conditions of potential environmental significance have been identified at the property:

- The property has historically been the object of investigation by WDOE for several reasons including the presence of drums of unknown materials at Lee Fabricators, uncontrolled sandblasting grit and the former presence of a coal gasification plant north of the site. A file is maintained at WDOE offices regarding the subject property, which includes properties located to the north and south, as well as the subject property. The subject site as defined herein is not currently listed as a site of suspected or confirmed contamination, nor have any soil samples apparently ever been obtained and analyzed from or beneath the site;
- The former presence of a coal gasification plant adjacent to the site on the north, and partially covering a portion of the subject property as defined to us by Mr. McConkey. Soil samples obtained north of the adjacent former bulk fuel facility suggest the presence of polynuclear aromatic hydrocarbons (PAHs) in concentrations well in excess of the cleanup levels published in the Model Toxics Control Act (MTCA), Chapter 173-340 WAC at this adjacent site;

- Fuel unloading docks partially or fully formerly located along the northern drive across the property that were adjacent to the former bulk fuel facility located adjacent to the property on the north. The potential for impacts to soil and/or groundwater possibly resulting from overfill and or spillage at these facilities is unevaluated and therefore remains unknown;
- The reported presence of a fuel pipeline across the northern property that, according to notes in the WDOE records, had an incidence of a "major" leak or spill;
- The presence of at least three unlabeled 55-gallon capacity drums on the property of unknown origin and contents located beneath the loading dock of building B-1;
- Sheet vinyl flooring suspected to possibly contain asbestos;
- The potential for the presence of PCBs in ballasts in fluorescent lights; and,
- Unknown type, capacity and/or location of fuel storage facilities for at least four historic oil-fired heating systems at the site at buildings B-2, B-3, B-5, and B-7.
- Unknowns relating to the composition/leachability of uncontrolled sandblasting grit at Lee Fabricators.

Momentarily excluding the above noted conditions, it appears that the subject property is free from contamination by potentially dangerous, hazardous, or toxic substances, and that such substances as defined under the Resource Conservation and Recovery Act (RCRA-42 USC-6901, et seq.), the Federal Water Pollution Control Act (33 USC 1257, et seq.), the Clean Air Compensation and Liability Act (42 USC 2001, et seq.), the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA: 42 USC 9601, et seq.), and the Dangerous Waste Regulations of the State of Washington, Chapter 173-303 WAC, have not been disposed of on the property.

WDOE FILES

As noted in the regulatory review section of this report, the WDOE maintains a file on the subject property, although the site does not appear in publicly available listings of confirmed and/or suspected contaminated sites (the C&SCS listing). A page was identified from a report prepared for WDOE by SAIC, and a reference is made to this report in at least one document found in Appendix D; however, the full report was not contained in the file at the time of our review. Also, Mr. Darrell Lee, Lee Fabricators, stated that he had provided WDOE with a copy of Toxicity Characteristics Leachate Procedure results of the spent sandblasting grit; however, these results also were not present in the file. Mr. Lee was adamant that he had sent WDOE a copy of this information. It has been our past experience with the WDOE on other projects that occasionally file information is either not fully disclosed to consultants or is not maintained in a readily retrievable manner as is their lawful charge. We would recommend that the owner

and/or lender contact the WDOE in an effort to determine the exact regulatory status of the subject property, and to request a full disclosure of all information in possession of the WDOE regarding the subject site, including but not limited to the said report.

ADJACENT FORMER COAL GASIFICATION PLANT

Coal gasification plants have long been identified as properties that frequently have adverse impacts to soil and/or groundwater and/or surface water from a class of carcinogenic chemical compounds known as polynuclear aromatic hydrocarbons (PAHs) such as chrysene, benzo(a)pyrene, etc. As an example, Gas Works Park in Seattle, Washington is a former coal gasification plant that is currently undergoing cleanup through the Superfund (CERCLA) process.

As noted throughout the report, a portion of the adjacent plant was formerly located beneath the northwest corner of the subject property, and has apparently been filled for structural considerations prior to construction of buildings B-4 and B-5. This comment is based upon review of historical aerial photographs. Contamination of soil and sediments has been confirmed at the adjacent property to the north (the Sesko property); however, no testing has been performed on site soil or groundwater that could assess the potential for the presence of PAHs or petroleum hydrocarbons typically associated with coal gasification plants.

Our research of WDOE files revealed no definitive information regarding the condition of subsurface soil and/or groundwater beneath the subject property. Possible impacts, if any, to the subject site therefore remains unknown. If a higher degree of confidence is desired, subsurface sampling and testing would be required. One or two shallow borings or test pit excavations could be used to obtain samples for analysis that could hopefully confirm that the site has not been impacted as a result of the former coal gasification plant.

FORMER FUEL UNLOADING DOCKS

Fuel unloading facilities have historically been located on the subject site adjacent to the former bulk fuel facility that was formerly located along the subject property's northern boundary. A storm drain is present at one former dock locality. A photograph of the unloading facility may be found in Appendix A (Site Information Provided by Mr. McConkey), and the approximate locations for these facilities are indicated in Appendix B (Sanborn Map Page Depicting the Subject Property) and on the Site Plan (Plate 6).

The potential for impacts to the subject property from possible overfilling/spillage of fuel at these docks during loading of trucks is unknown. One or two borings or shallow trenches along with soil sampling and analysis could possibly be used to assess soil and/or groundwater conditions at these localities.

FUEL PIPELINE

As noted earlier in the report, review of the 1936 aerial photograph depicting the subject property, as well as statements made by Mr. McConkey during our site reconnaissance, suggests that a fuel pipeline was formerly and likely currently exists in the vicinity of the southern edges of buildings B-4 and B-5. Anecdotal statements by Mr. Darrell Lee contained in WDOE files suggests that a major leak or spill occurred somewhere along the pipeline (location unknown). The potential for impacts to the subject property possibly resulting from the presence of this pipeline or from the reported "spill" remains unknown, as no soil or groundwater sampling and/or testing has been performed at the subject property in the vicinity of the pipeline. Again, one or two shallow borings and/or test pit excavations/trenches could be used to obtain samples for analysis to assess the potential for impacts to the site from this source.

UNLABELED DRUMS

As noted throughout the report, unlabeled drums have repeatedly been present on the property and at adjacent sites (Sesko Property to the north and the C.B Concrete property to the south) even following site inspections by WDOE personnel. Apparently, Mr. McConkey had some of the drums removed from the subject property as indicated in his letter to WDOE dated May 22, 1994 found in Appendix C. At least three unlabeled drums with unknown contents were noted by us beneath the loading dock of building B-1. One of the drums had a hole rusted through at its base, and a white-colored apparently rocky material was noted inside the drum. We were unable to access any of the drums due to the presence of the loading dock.

We recommend lawful removal of these drums in accordance with the Dangerous Waste Regulations of Washington, Chapter 173-303 WAC, in an effort to avoid possible agency penalties, to reduce the potential for impacts to the subject site or employee health through contact with the materials in the drums, and in an effort to avoid future accumulations of unlabeled drums in this area. Prior to lawful removal, the contents of the drums should be identified if possible, or the material in the drum should be tested to identify the substance(s) contained therein, and appropriately labeled, and the drums should be removed by chain-of-custody and manifest procedures in accordance with state and federal law.

ASBESTOS

Borrowing evaluation criteria adopted under the Asbestos Health Emergency Response Act (AHERA, 40 CFR Part 763), the sheet vinyl flooring suspected to possibly contain asbestos is in "good" condition. In the current use and condition, the material poses no threat to public health or to the environment. No action would be required under current state or federal regulations. Approximately 100 square feet of the material was noted in building B-2.

Mr. Paul McConkey
September 30, 1997.

JN 7328
Page - 32

Should the owner intend to renovate, demolish, remodel, or repair any or all portions of the structure containing asbestos, please note that applicable sections of WAC 296-65 require that all projects relating to construction, demolition, repair, or maintenance where release or likely release of asbestos fibers into the air could occur must be performed by "certified asbestos workers". Additional information may be obtained through the offices of Environmental Associates, Inc., or directly from the Washington State Department of Labor and Industries, P.O. Box 207, Olympia, Washington 98504.

If not already in place, to reduce the potential for future liability, it may be prudent to implement a management policy (Operations and Maintenance) whereby all maintenance, repair, and service personnel working on the property are formally advised (i.e., signed acknowledgement) as to the suspected presence of asbestos-containing materials (ACM) prior to commencement of any work associated with the ACM.

PCBs

Based upon the information developed during the course of our site review, it appears that some or all of the transformer ballasts in the fluorescent lights in the subject building may contain polychlorinated biphenyls (PCBs).

In our opinion, there is not immediate cause for concern regarding the potential for PCB-containing light ballasts. The only likely potential for exposure to PCBs would come in the event that one of the sealed ballasts were ruptured through abusive handling or as a result of a defect in a ballast.

It may be prudent to implement a management policy providing the inspection of ballasts by maintenance personnel during routine bulb changing activities. Ballasts may be periodically checked or replaced depending upon long-term management desires. Please refer to the attached EPA pamphlet (Appendix F) regarding appropriate handling and disposal practices for such ballasts.

UNKNOWNNS RELATING TO FORMER ON-SITE HEATING FUEL STORAGE TANKS

As noted earlier in the report, research and anecdotal information suggests that heating systems for certain site building were formerly powered by oil. No information regarding the exact location, type (above- or below-ground), capacity, etc., was identified, although Mr. Darrell Lee of Lee Fabricators, Inc., stated that the fuel storage for building B-8 was underground.

Our research of WDOE, Bremerton Fire Department, City of Bremerton Building Permits and/or other readily available/reasonably ascertainable resources revealed no definitive information regarding the fate or location of the tanks, whether they were above-ground or below-ground installations, and/or condition of subsurface soil and/or groundwater in the vicinity of the storage

tanks. This lack of data is not surprising or unusual given the age of the building and the non-uniformity of application of tank registry and environmental regulations over the years in Washington.

As noted in the previous section, assessment of subsurface soil and/or groundwater conditions cannot be accomplished through visual examination of surficial conditions afforded by the scope of our Level 1 audit effort. This limitation combined with unknowns regarding the existence and/or location of a previously-mentioned fuel storage tanks provides the basis for the following management alternatives offered for discussion and consideration:

- (1) A ground-penetrating radar survey or other geophysical survey could be performed in areas likely to have been used for fuel storage in an effort to determine the size, depth and orientation of any underground storage tanks.
- (2) Using the information obtained through geophysical survey, subsurface sampling and laboratory testing of soils from hand auger, drilling or other excavation methods could be employed to efficiently, nondestructively, and relatively inexpensively explore soil conditions at the site of any identified tank(s), which could hopefully confirm that soil conditions at that location are compatible with existing soil quality criteria offered under the MTCA, Chapter 173-340-740 WAC.

Decision-making authority regarding selection and/or implementation of one of the above alternatives or other approaches clearly lies with the property owner and/or the lender, depending upon their individual risk tolerances.

SANDBLASTING GRIT

As noted earlier in the report, it would appear that the WDOE may have little interest in the sandblasting grit issue at Lee Fabricators at this time; however, we have not been able to review a copy of the reported Toxicity Characteristics Leachate Procedure (TCLP) testing results at this time. We would recommend, as a minimum, that the results be obtained from Mr. Lee and compared to the Dangerous Waste criteria, Chapter 173-303 WAC. As noted earlier, we are awaiting receipt of a copy of the reported TCLP test results from Mr. Lee. When we receive a copy of the 1994 results, we will provide an amendment to this report as necessary. Should Mr. Lee not be able to provide a copy of the results, or if more current data is desirable than the testing reported in 1994, we would recommend that a sample of the spent sandblasting grit be obtained and submitted to the laboratory for TCLP analysis.

LIMITATIONS

This report has been prepared for the exclusive use of Mr. Paul McConkey, along with First Mumal Bank and their several representatives for specific application to this site. Our work for this project was conducted in a manner consistent with that level of care and skill normally exercised by members of the environmental science profession currently practicing under similar conditions in the area, and in accordance with the terms and conditions set forth in our proposal dated August 22, 1997. The condition of subsurface soil and/or groundwater cannot typically be determined by visual examination of surficial conditions such as those afforded by a Phase 1 audit such as performed here. Acknowledging that limitation, no warranty in that regard is made. No other warranty, expressed or implied, is made. If new information is developed in future site work which may include excavations, borings, studies, etc., Environmental Associates, Inc., must be retained to reevaluate the conclusions of this report and to provide amendments as required.

The level of effort regarding identification of potential ACM should be considered a reconnaissance, should not be confused with an asbestos survey, and should not be used as a sole informational resource for removal or abatement bidding purposes.

REFERENCES

GENERAL

Bonneville Power Administration (BPA), January 1993, Radon Monitoring Results from BPA's Residential Conservation Program, Report No. 15, (with April 1993 Map).

Deeter, J.D., 1979, Quaternary Geology and Stratigraphy of Kitsap County, Washington. Bellingham, Washington, Western Washington University, unpublished M.S. Thesis, 175 pps.

Environmental Protection Agency (EPA), September 1987, Radon Reference Manual EPA 520/1-87-20.

Thomas Brothers Map Co., 1994, The Thomas Guide: King/Pierce/Snohomish Counties.

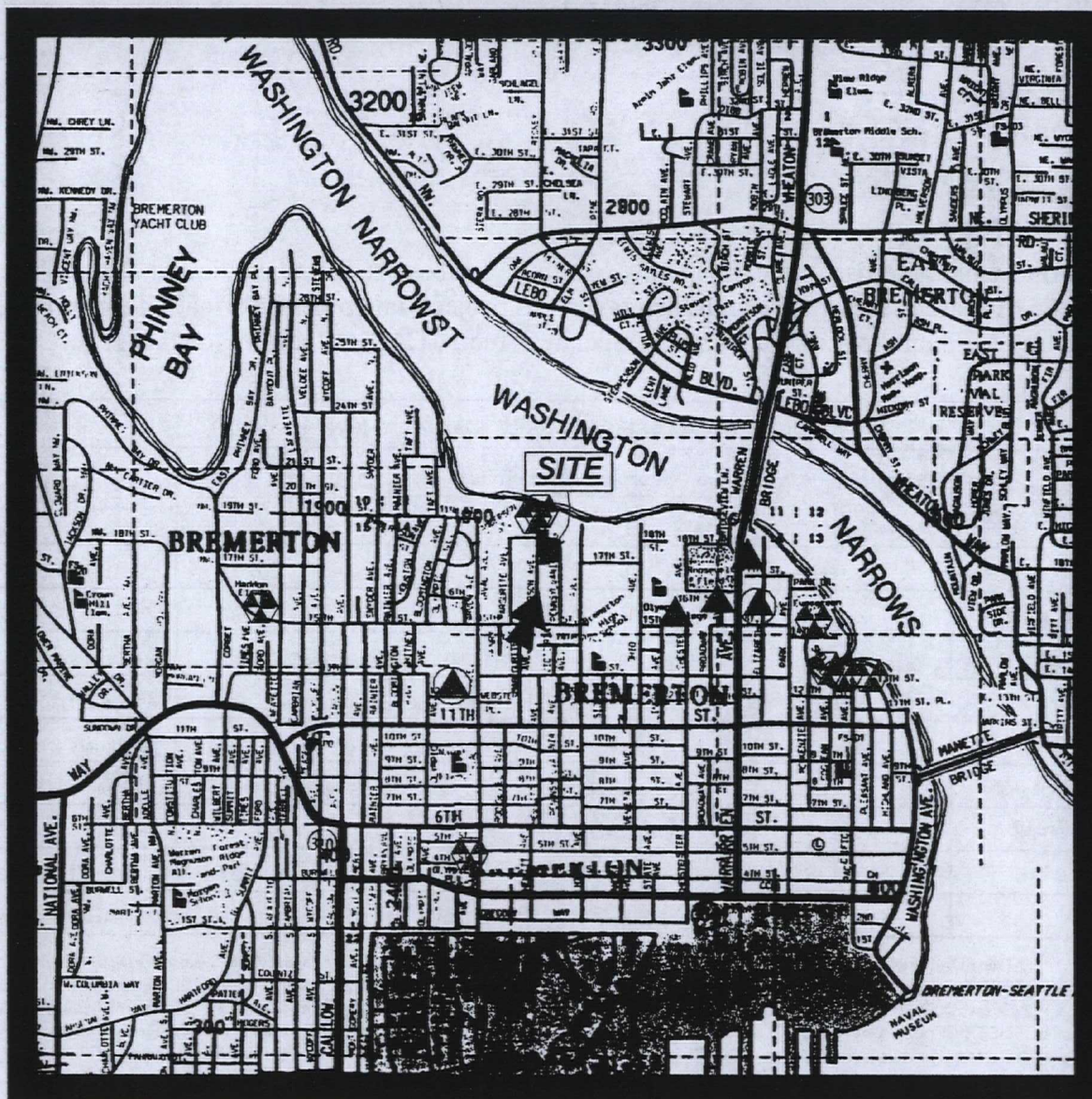
U.S. Geological Survey, 1953, Bremerton East, Washington 1:24,000 Quadrangle. From aerial photographs obtained 1951, photorevised 1981 from 1978 aerial photographs, 1 sheet.

U.S. Geological Survey, 1953, Bremerton West, Washington 1:24,000 Quadrangle. From aerial photographs obtained 1951, photorevised 1981 from 1978 aerial photographs, 1 sheet.

DATABASE

The following table lists the various governmental database resources reviewed for this project, the ASTM search radius, the search radius for this project, and other information for most recent databases available to Environmental Associates, Inc., (EAI) at the time of this report.

DATABASE RESOURCE INFORMATION					
Database	Source	Search Radius (miles)		Last Update	List Date
		ASTM	EAI		
NPL	U.S. EPA	1.0	1.0	April 15, 1997	April 22, 1997
CERCLIS	U.S. EPA	0.5	1.0	April 15, 1997	April 22, 1997
C&SCS	WDOE	1.0	1.0	January 7, 1997	February 21, 1997
UST	WDOE	Site & adjacent	0.5	January 3, 1997	February 26, 1997
LUST	WDOE	0.5	0.5	January 3, 1997	February 21, 1997
State Landfill	WDOE	1.0	1.0	June 13, 1996	September 3, 1996
RCRIS/FINDS ¹	U.S. EPA	Site & adjacent	0.5	April 11, 1997	April 11, 1997
RCRA TSD	U.S. EPA	1.0	1.0	April 14, 1997	April 14, 1997
ERNS	U.S. EPA	Site only	Site only	December 31, 1996	January 10, 1997
<p>1 - The RCRIS/FINDS listing provided by the EPA Region X includes the following databases: RCRIS Large Quantity Generators; RCRIS Small Quantity Generator, Permit Compliance System (PCS); Airs Facility System (AIRS/AFS); Section Seven Tracking System (SSTS); National Compliance Database (NCDB); Enforcement Docket System (DOCKET); Contractor Listing (CONTR LIST); Criminal Docket (CRIM DOCKET); Federal Facility Information System (FFIS); Chemicals in Commerce Information System (CICIS); State Systems (STATE); PCB Activity Handler Activity Data System (PADS); Toxic Chemical Release Inventory System (TRIS), and; Dun & Bradstreet (DUNS).</p>					



(Source: Roadrunner Maps, 1995, Kitsap/Mason/Thurston County Street Atlas, pages 26, 27, and 33.)



Probable Direction of Shallow-Seated Groundwater Flow



Approximate Location of WDOE-Listed Underground Storage Tank Site

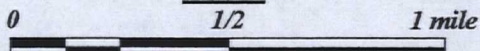


Approximate Location of WDOE-Listed Leaking Underground Storage Tank Site

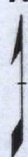


Approximate Location of WDOE C&SCS-Listed Site (MTCA Listing)

Scale



N



ENVIRONMENTAL ASSOCIATES, INC.

2122 - 112th Avenue N.E., Ste. B-100
Bellevue, Washington 98004

VICINITY MAP

Penn Plaza
1727 Pennsylvania Avenue
Bremerton, Washington

Job Number:

JN 7328

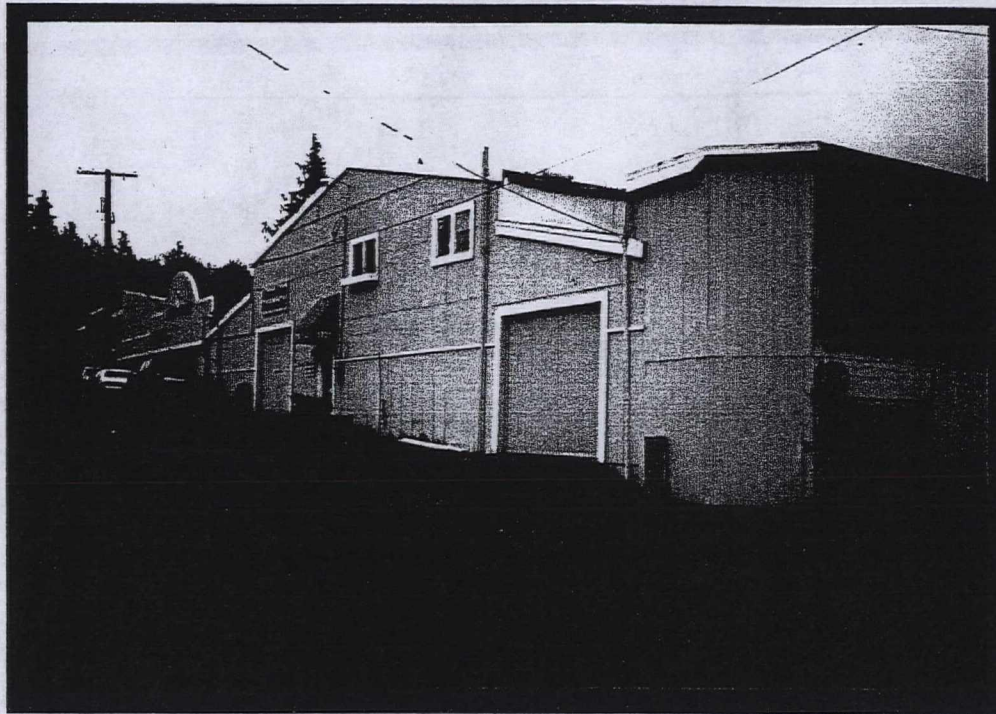
Date:

Sept. 1997

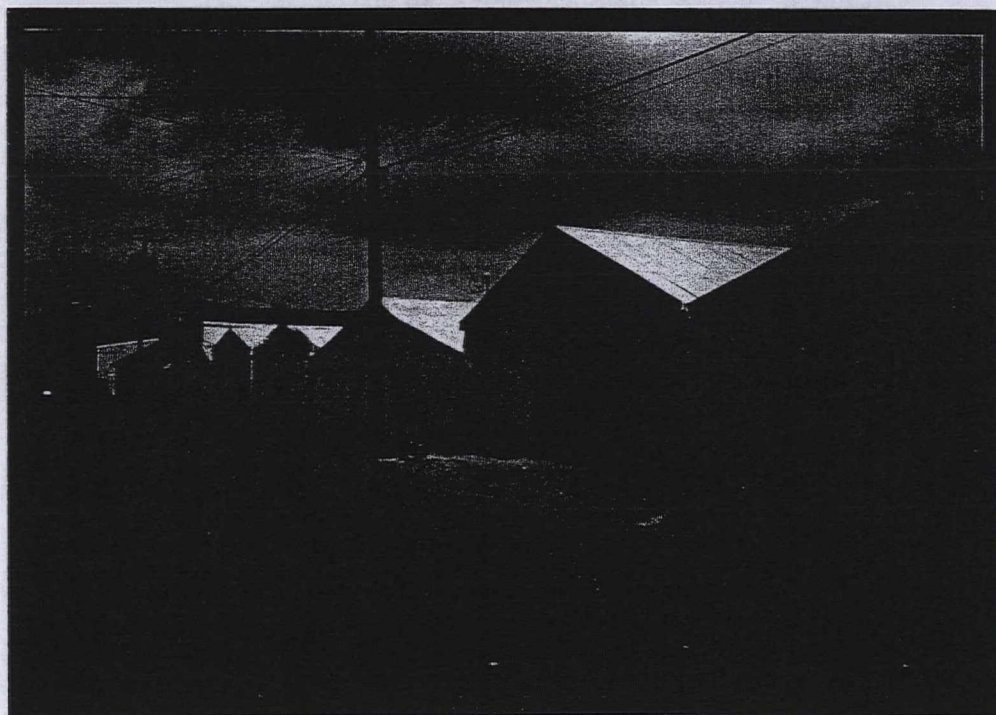
Plate:

1

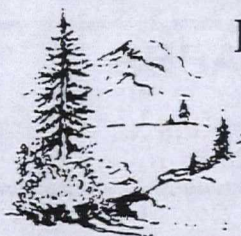




View of the subject property from the northeast. Adjacent buildings B-3, B-2 and B-1 visible from foreground to left background.



View of the subject site from the southwest. Adjacent buildings B-11, B-10, B-9, B-8, B-7, and B-6 visible from foreground to left background. Building B-5 visible at extreme left.



ENVIRONMENTAL

2122 - 112th Avenue N.E., Ste. B-100
Bellevue, Washington 98004

SITE PHOTOGRAPHS

Penn Plaza
1727 Pennsylvania Avenue
Bremerton, Washington

Job Number:

JN 7328

Date:

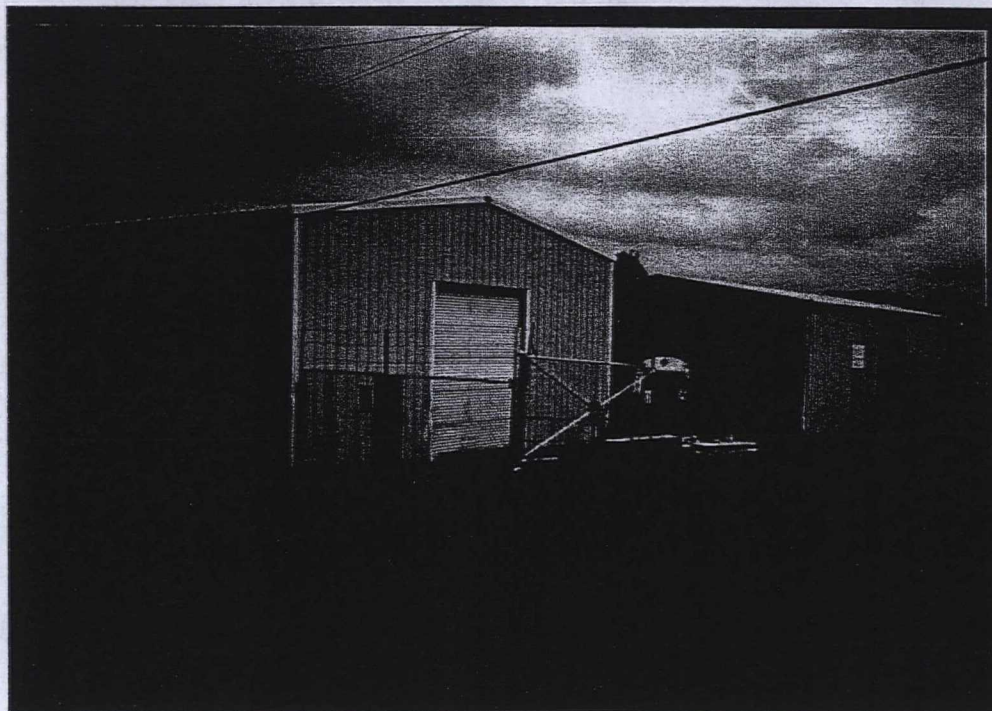
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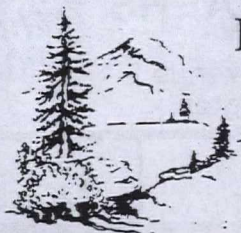
2



View of the subject property from the west. Building B-6 unit A visible at right, shed at center of photo, and portion of building B-3 at left rear.



View of the northern portion of the site showing buildings B-4 and B-5.
View looks toward the east-northeast.



ENVIRONMENTAL

2122 - 112th Avenue N.E., Ste. B-100
Bellevue, Washington 98004

SITE PHOTOGRAPHS

Penn Plaza
1727 Pennsylvania Avenue
Bremerton, Washington

Job Number:

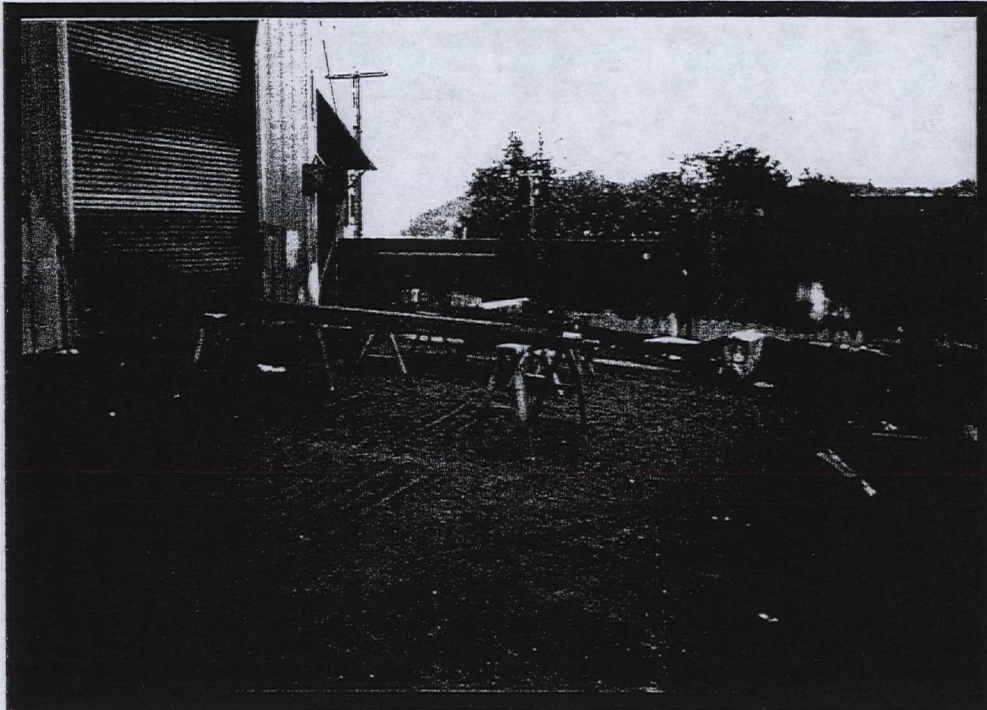
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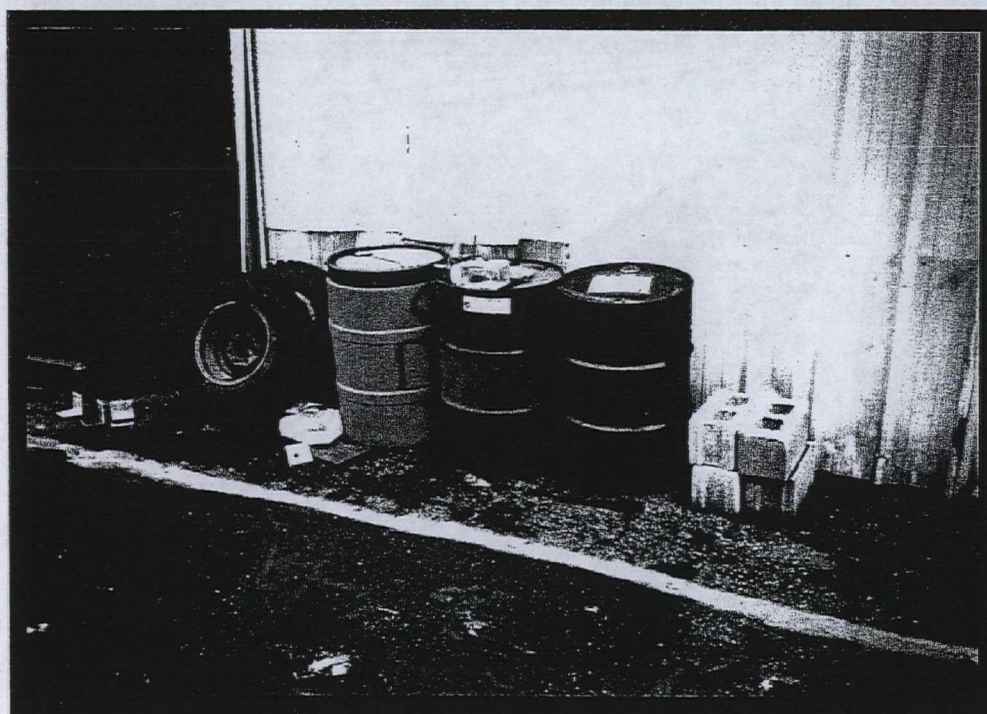
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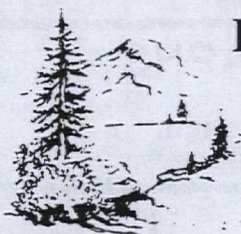
3



View of the sandblasting area east and north of building B-5 occupied by Lee Fabricators. Northern property line is roughly defined by wall at rear of photo. Shed barely visible at right edge of building is a former paint booth.



View of the oil storage drums adjacent to the west side of building B-4 occupied by Pacific Coast Energy's truck repair facility. Note labels on drums.



ENVIRONMENTAL

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Bellevue, Washington 98004

SITE PHOTOGRAPHS

Penn Plaza
1727 Pennsylvania Avenue
Bremerton, Washington

Job Number:

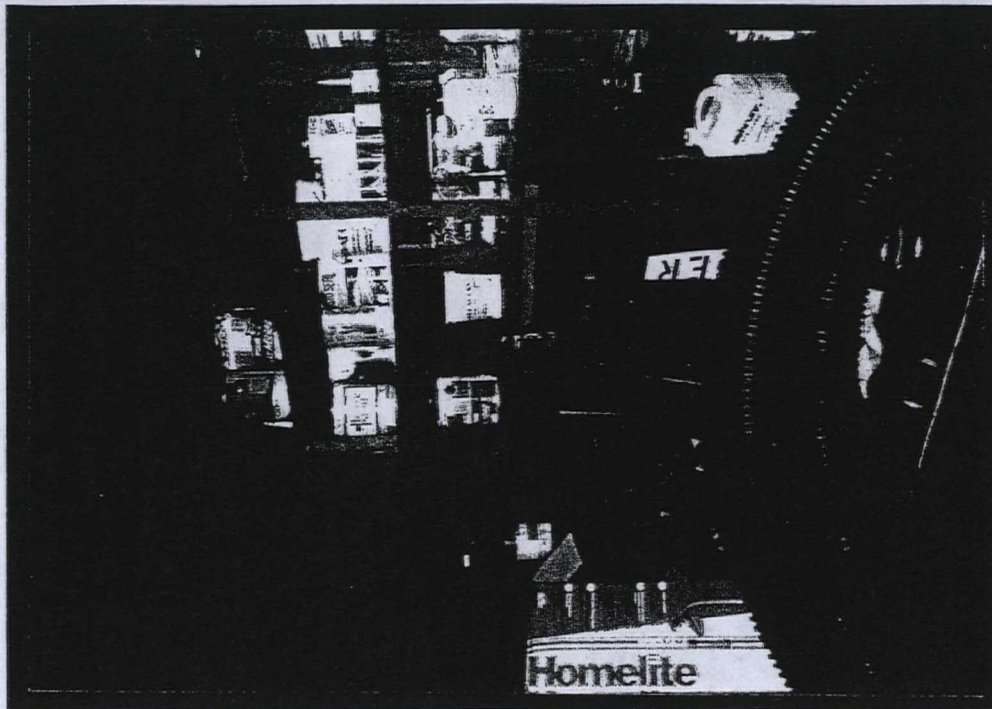
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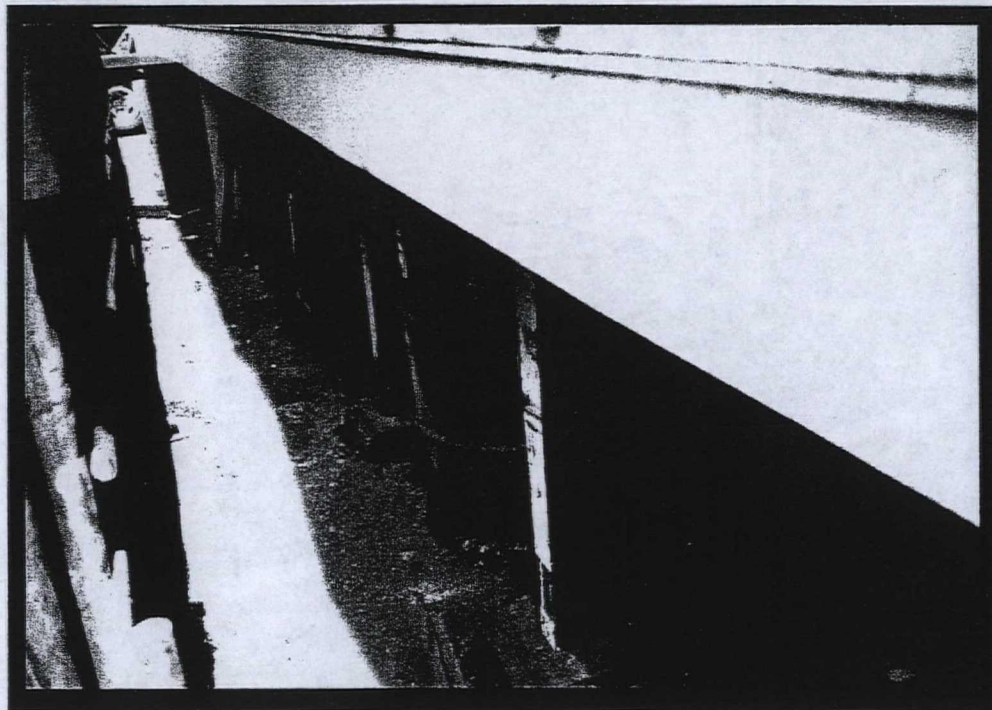
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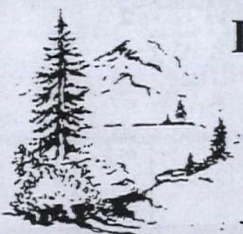
4



Typical view of the interior spaces of building B-3. This is the area used for storage of maintenance items by Mr. McConkey.



View of the drum storage area of unknown materials beneath the loading dock of building B-1, which will be occupied by a propeller repair company in the near future.



ENVIRONMENTAL

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Bellevue, Washington 98004

SITE PHOTOGRAPHS

Penn Plaza
1727 Pennsylvania Avenue
Bremerton, Washington

Job Number:

JN 7328

Date:

Sept. 1997

Plate:

5



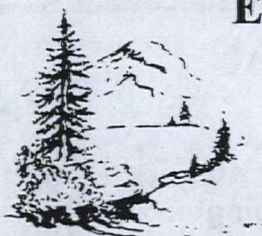
(Sources: USGS, 1953, Bremerton East, WA 1:24,000 Quadrangle. From aerial photographs taken 1951, photorevised 1981 from 1978 aerial photographs, 1 sheet, and; USGS, 1953, Bremerton West, WA, 1:24,000 quadrangle. From aerial photographs taken 1951, photorevised 1981 from 1978 aerial photographs. Contour Interval = 20 feet [both maps].)



Probable Direction of Shallow-Seated Groundwater Flow

Scale

0 1/2 1 mile



**ENVIRONMENTAL
ASSOCIATES, INC.**

2122 - 112th Avenue N.E., Ste. B-100
Bellevue, Washington 98004

Vicinity Topographic Map

Penn Plaza
1727 Pennsylvania Avenue
Bremerton, Washington

Job Number:

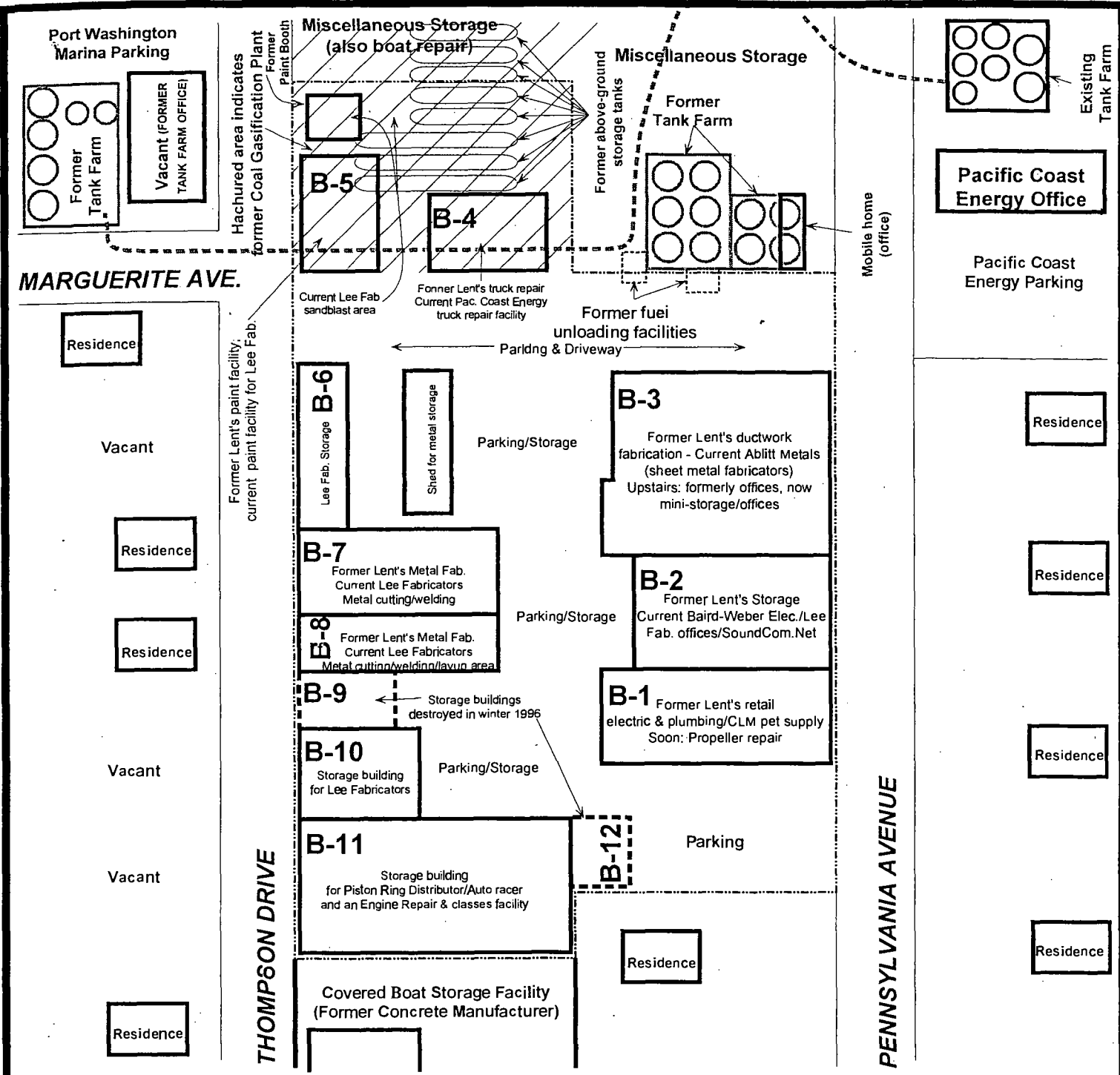
JN 7328

Date:

Sept. 1997

Plate:

7



ENVIRONMENTAL ASSOCIATES, INC.

2122 - 112th Avenue N.E., Ste. B-100
Bellevue, Washington 98004

SITE PLAN

Penn Plaza
1727 Pennsylvania Avenue
Bremerton, Washington

Job Number:

JN 7328

Date:

Sept. 1997

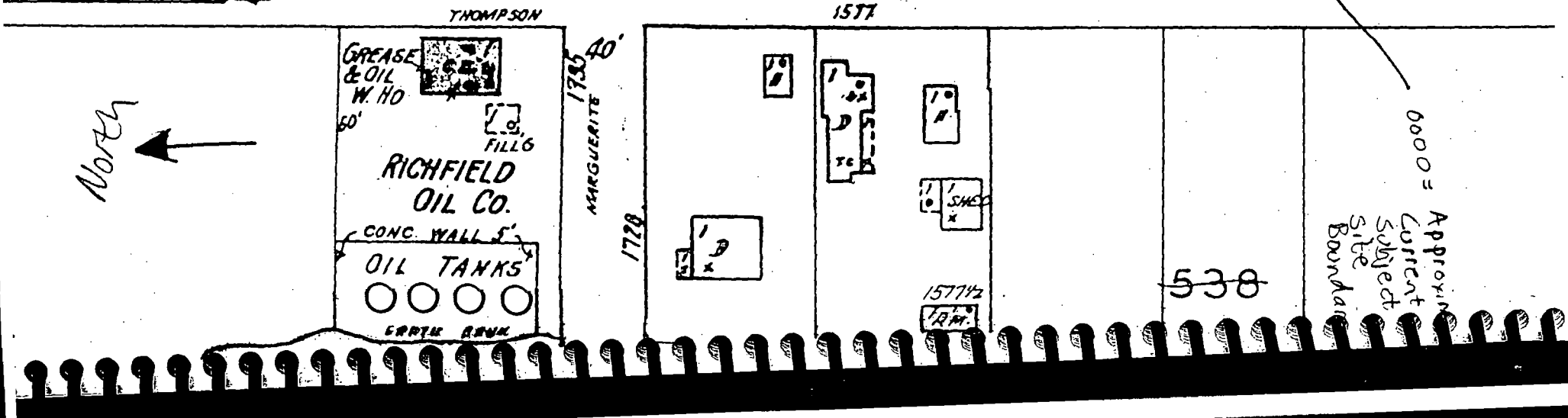
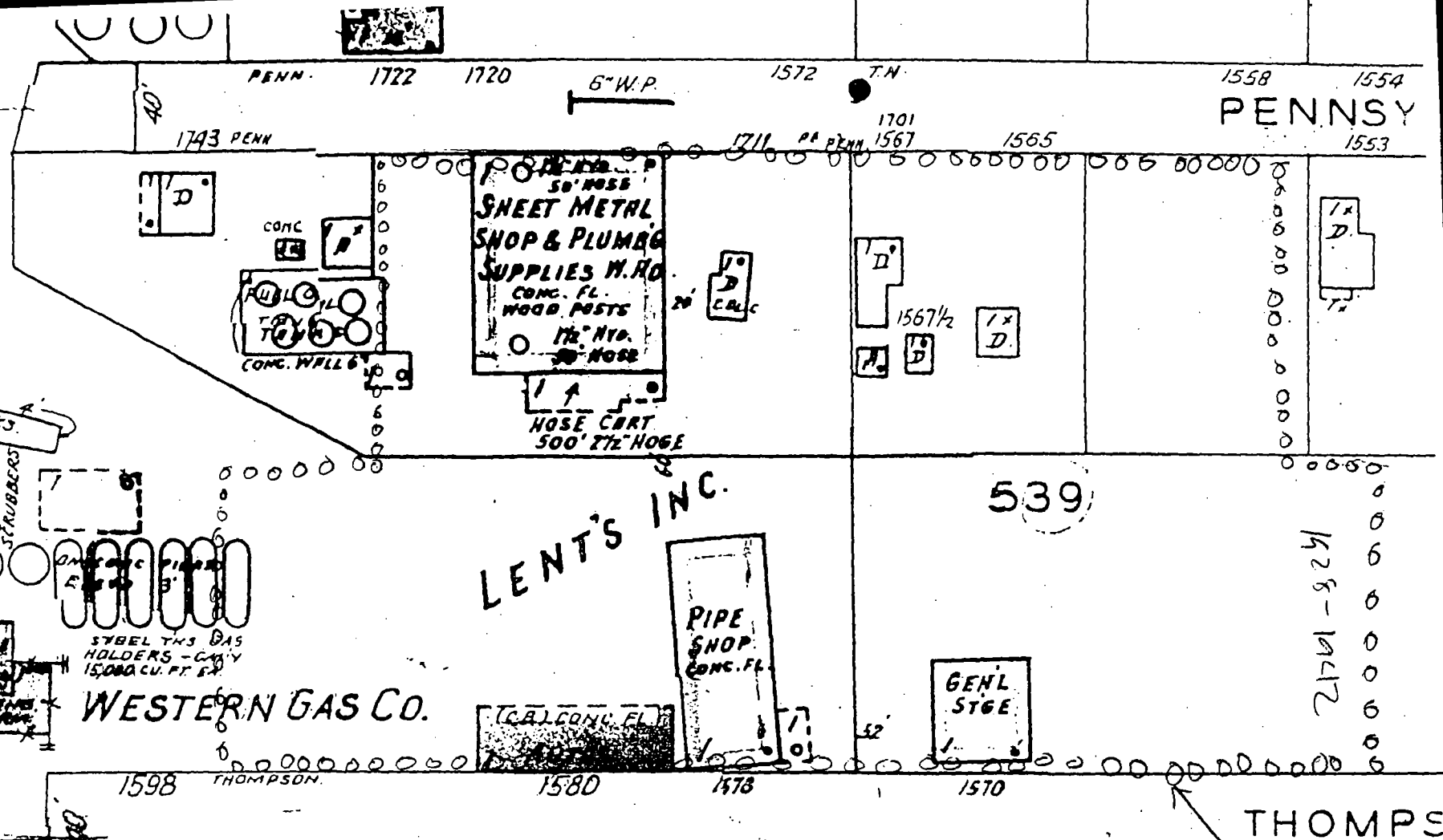
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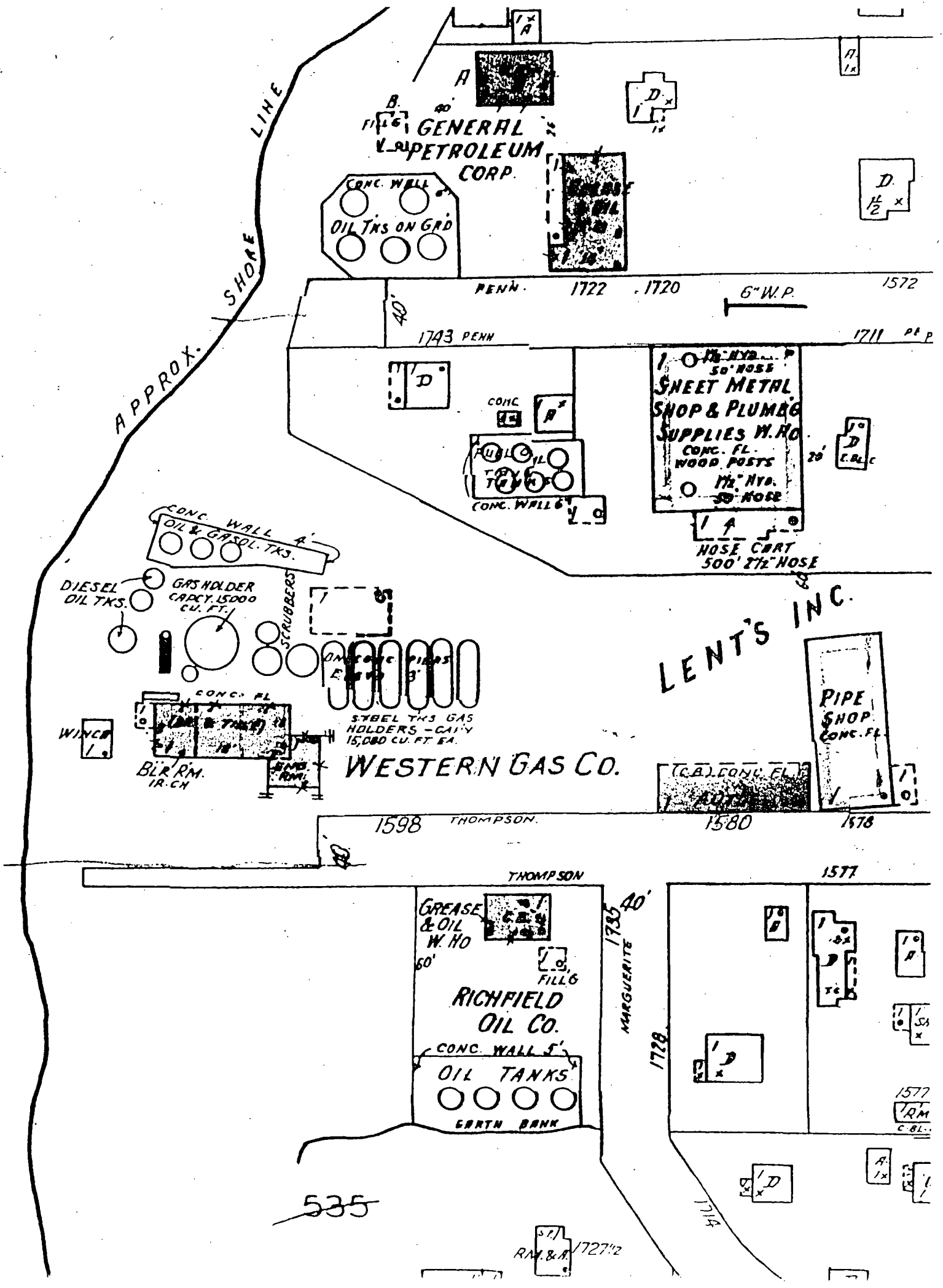
6

APPENDIX A

Sanborn Map Page Depicting the Subject Site

APPROX. SHOP





APPROX. SHORE LINE

GENERAL PETROLEUM CORP.

OIL TNS ON GRD

PENN. 1722 1720

6" W.P.

1572

1743 PENN

1711 P.E.P.

1 1/2" NYA 50' HOSE
SHEET METAL SHOP & PLUMBING SUPPLIES W. HO.
CONC. FL. WOOD POSTS
1 1/2" NYA 50' HOSE

HOSE CART 500' 2 1/2" HOSE

LENT'S INC.

PIPE SHOP CONG. FL.

WESTERN GAS CO.

STEEL TNS GAS HOLDERS - CAPCY 15,000 CU. FT. EA.

1598 THOMPSON

1580

1578

THOMPSON

1577

GREASE & OIL W. HO 60'

RICHFIELD OIL CO.

OIL TANKS
EARTH BANK

MARGUERITE 1735 40' 1728

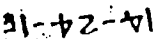
535

RM. & R. 1727 1/2

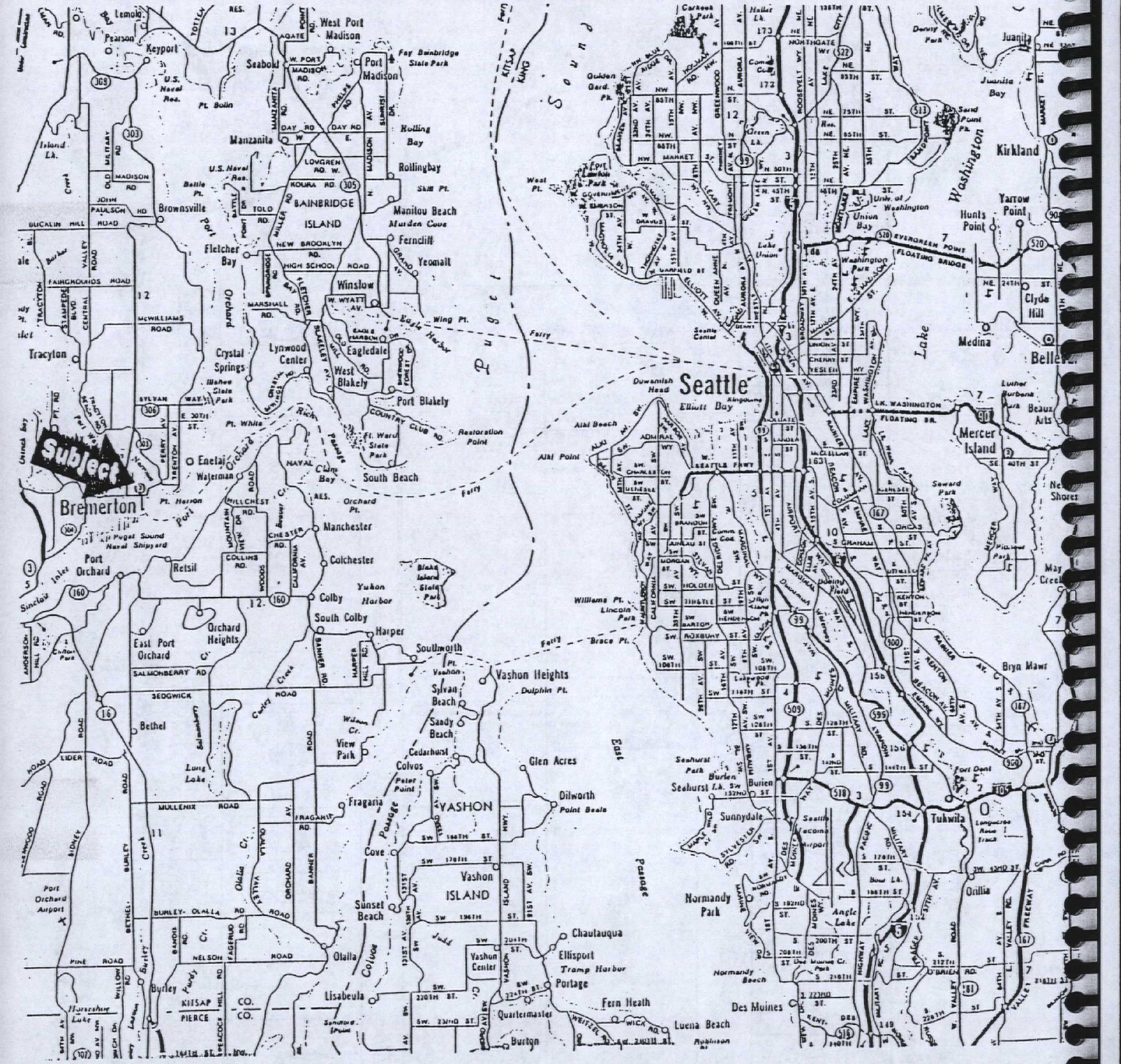
APPENDIX B

Site Information Provided by Mr. McConkey

Site Plan



Area Map



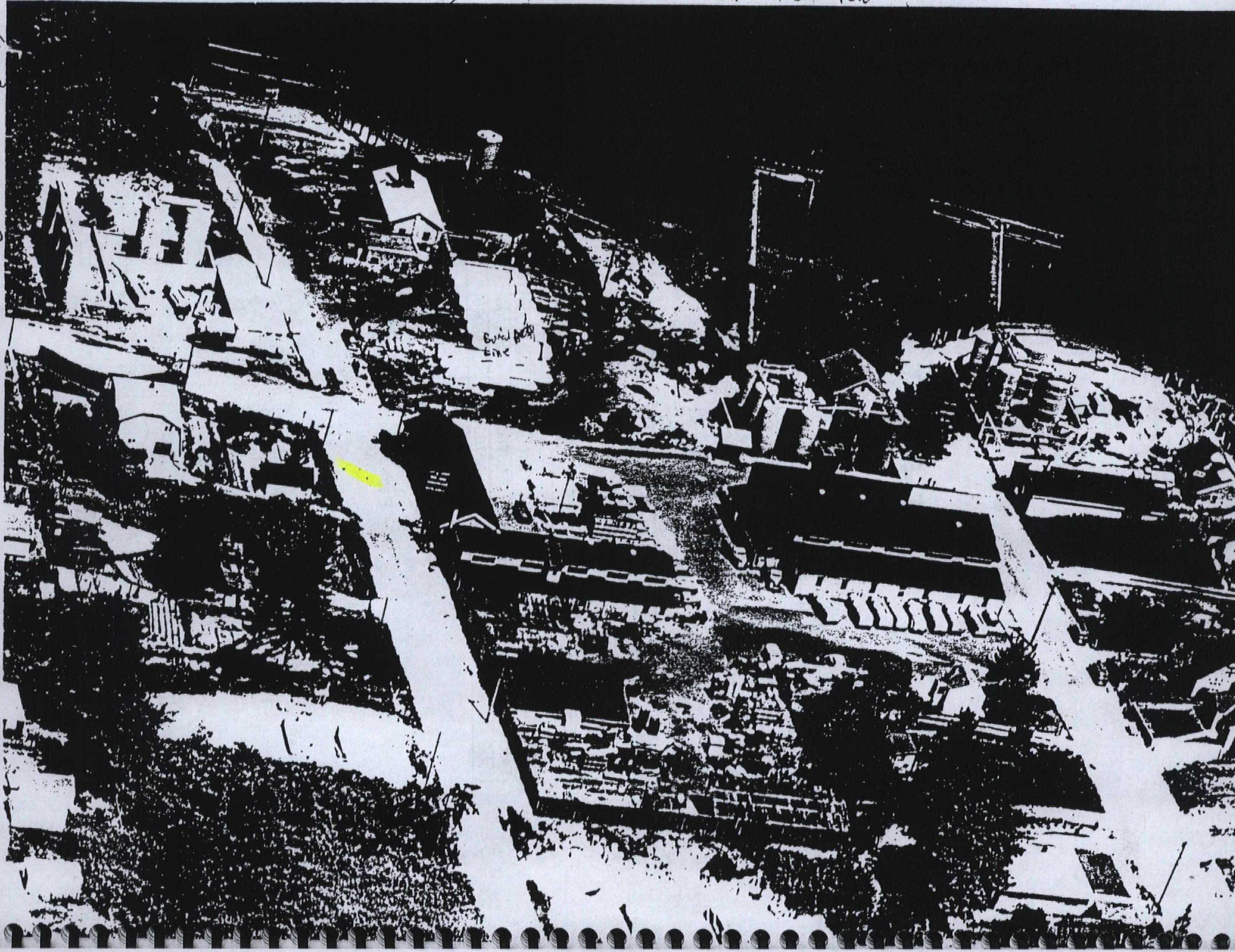
FACT SHEET

6/15/97



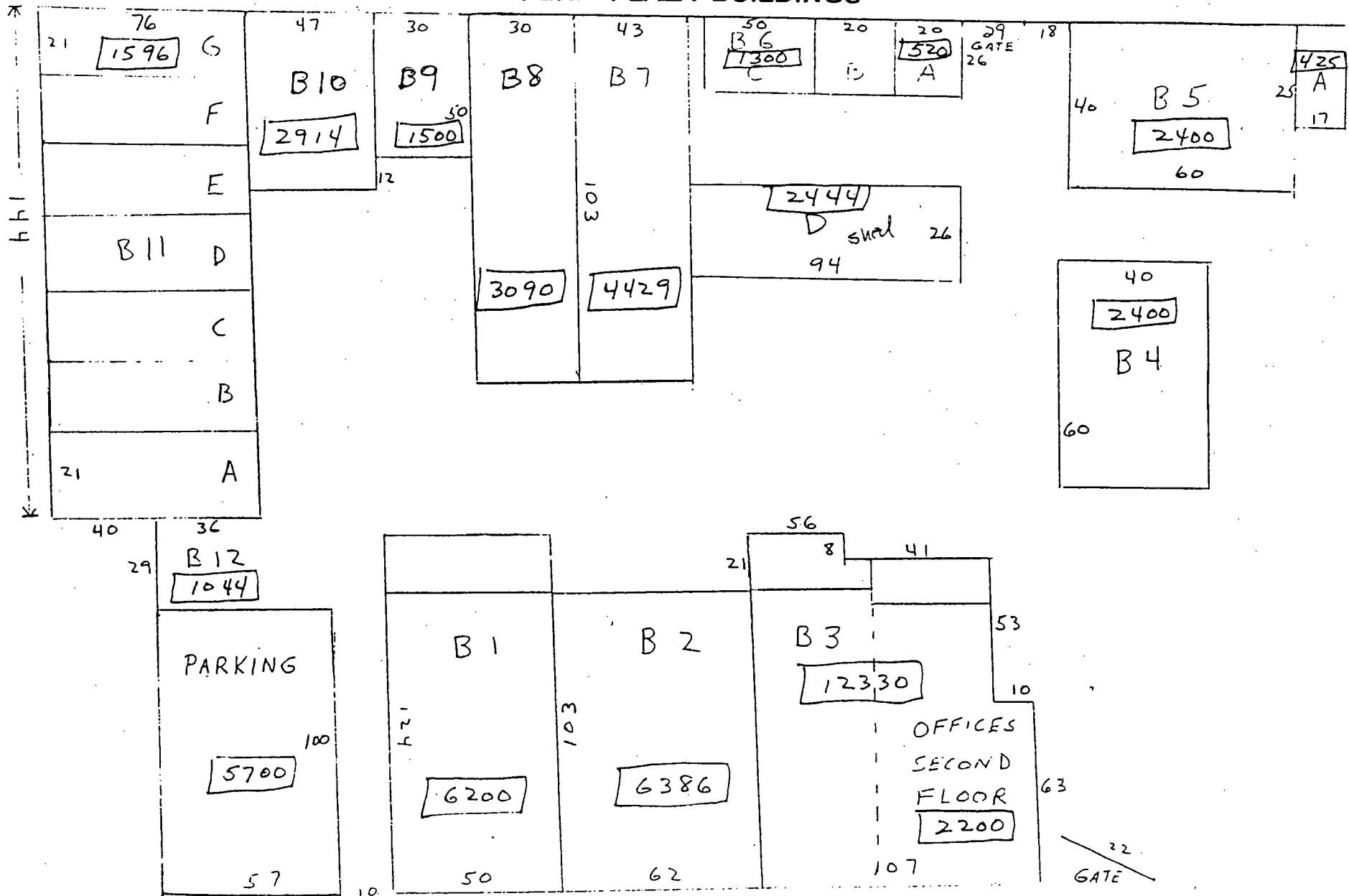
	PENN PLAZA	BCP	TOTAL
LAND AREA	133967	112304	246271
ACREAGE	3.08	2.58	5.66
BUILDING SQUARE FEET	59872	27749	87621
MAI APPRL LAND 1987	420000	356500	776500
MAI APPRL BLDGS 1987	432785	377342	810127
MAI APPRL TOTAL 1987	852785	733842	1586627
MAI APPRL LAND 1995	293000		
MAI APPRL BLDGS 1995	641370		
MAI APPRL TOTAL 1995	934370		
TAX APPRL LAND 1996	470000	247000	717000
TAX APPRL BLDG 1996	337000	216000	553000
TAX APPRL TOTAL 1996	807000	463000	1270000

1801 2000 3000 4000 5000 6000 7000 8000 9000 10000



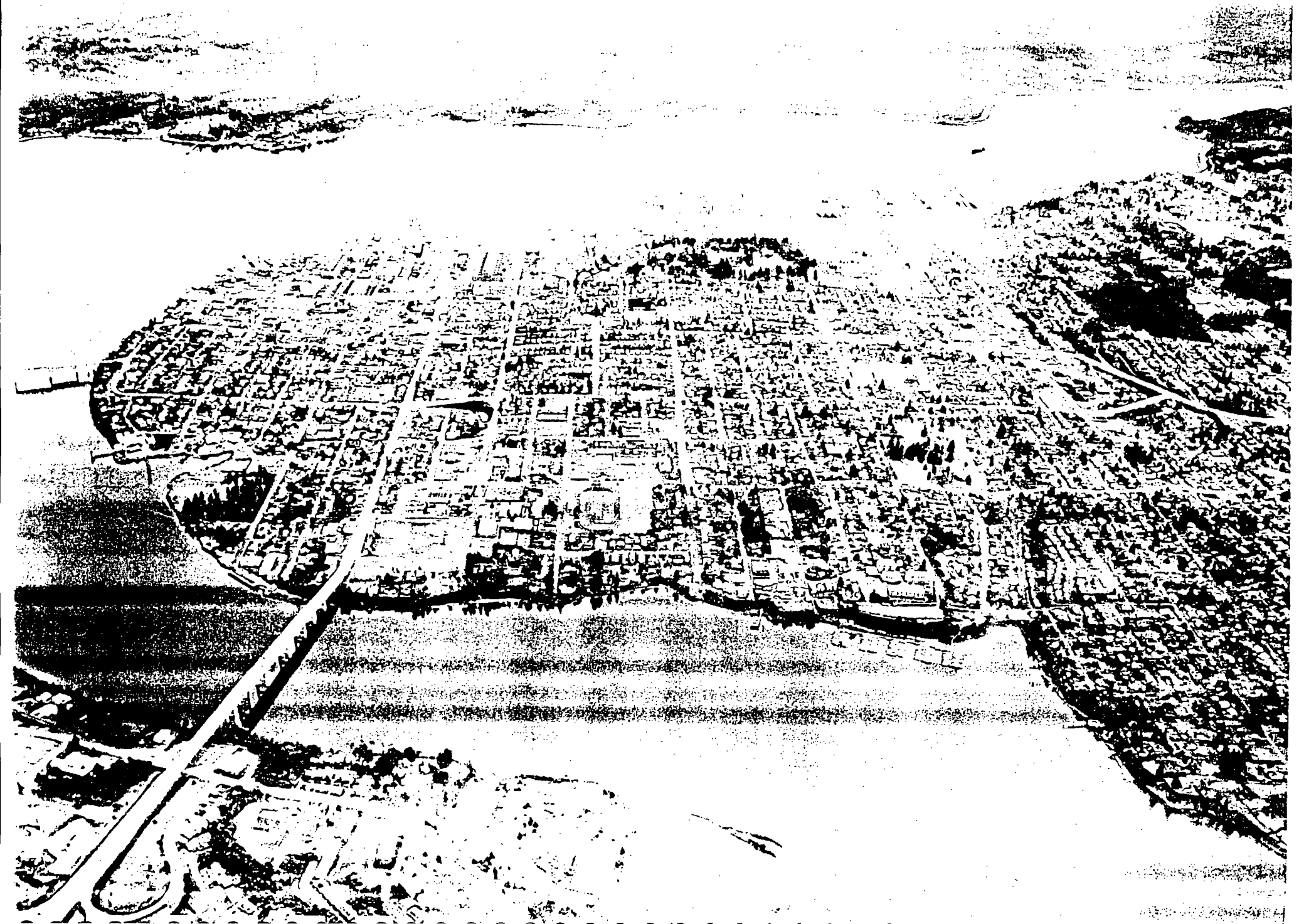


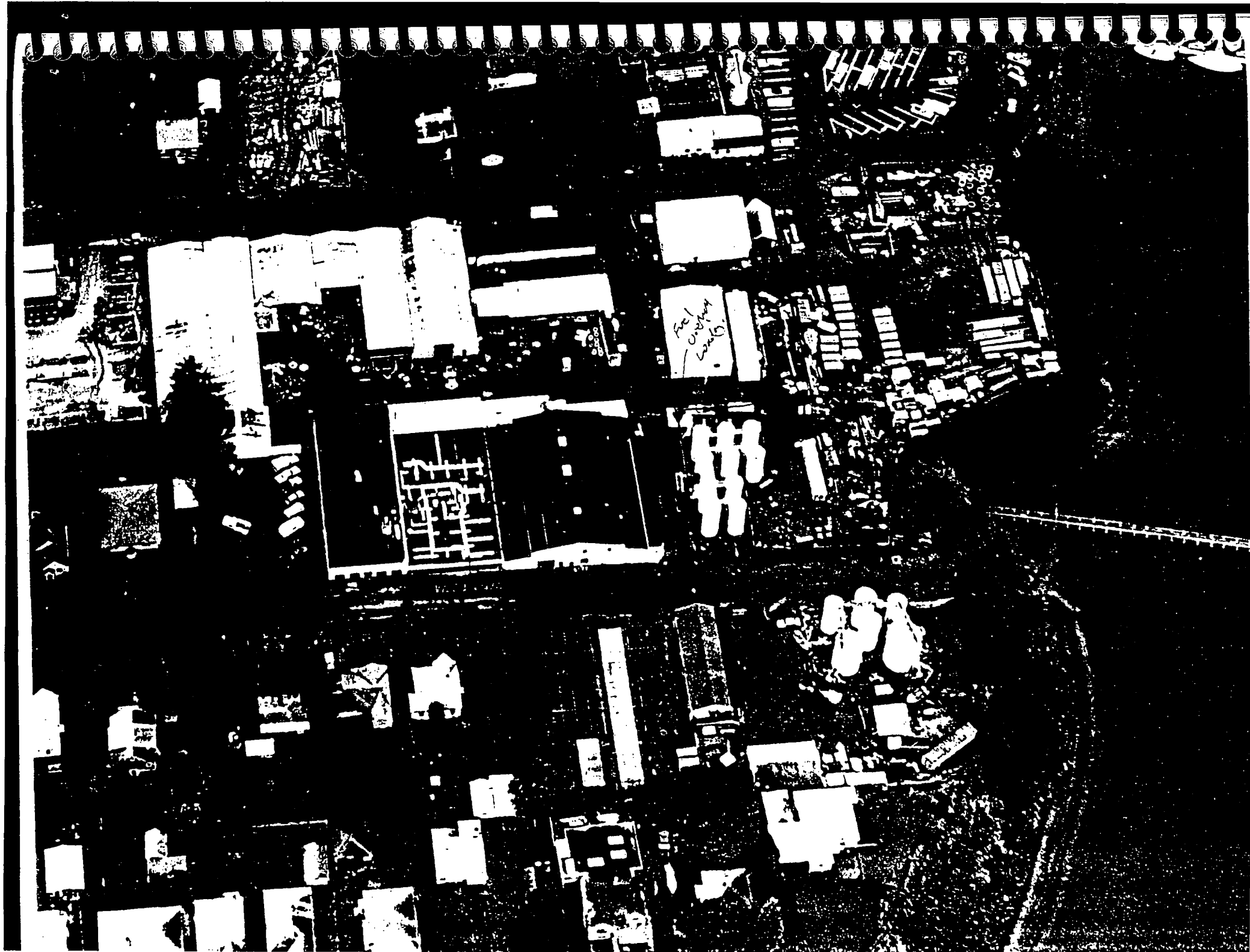
PENN PLAZA BUILDINGS



440
UPPER YARD

611
TOTAL PENN PLAZA





APPENDIX C

WDOE File Information: Lee Fabricators

DEPARTMENT OF ECOLOGY
INSPECTION REPORT

To: File
Inspectors: F. Solomon, D. Cargill
Date of Visit: 1/22/92 Permit No.: WA- N/A
New Industry: ☐ Yes ☒ No Permit Expires: N/A

Type of Inspection:

<input type="checkbox"/> Permit Application	<input type="checkbox"/> Complaint	<input type="checkbox"/> Announced
<input type="checkbox"/> Permit Renewal	<input type="checkbox"/> Enforcement	<input checked="" type="checkbox"/> Unannounced
<input type="checkbox"/> Permit Compliance	<input checked="" type="checkbox"/> Source Control	

Facility: Lee Fabricators
Address: Penn Plaza Industrial Park, 1725 Pennsylvania Avenue
City: Bremerton Zip: 98310 County: Kitsap
Telephone: (206) 373-5043
Person Contacted: Darrell Lee, Owner
Type of Facility: Metal Fabricating
Receiving Water: Port Washington Narrows
Type of Treatment System: BMPs
Complies with permit conditions: ☐ Yes ☐ No ☒ N/A

NARRATIVE:

We arrived at the facility at 9:00 AM and met with Darrell Lee, the owner of the facility. We initiated the inspection by explaining the purpose of the Sinclair and Dyes Inlets Action Program and requesting a tour of the facility. We toured the facility from east to west and then walked back east through the shop buildings.

Lee Fabricators is a metal fabricating business that has been at this location on a bluff above Port Washington Narrows for six years. Mr. Lee employs ten people. Operations include metal cutting, fitting, and welding as well as manufacturing of containment vessels for nuclear wastes. According to Mr. Lee, the facility generates no more than twenty gallons of hazardous wastes per month.

The facility is hooked up to the Bremerton Wastewater Treatment Plant. There are two catch basins west of the shop buildings. No steam cleaning or vehicle maintenance occur on site.

The machine shop appeared to be clean. Mr. Lee showed us a metal cutting machine with a sump below it. He uses a water soluble cutting solution which is recirculated. Mr. Lee said that one person works full-time on cleaning the shop floors; a grease sweep is used to clean up cutting oil spills. There are no indoor floor drains. The floor slopes to the center of the shop. It does not appear that spills will reach the outdoor catch basins.

Inspection Report - 5/13/92
Lee Fabricators
Page 2

Next, we toured the welding shop. Mr. Lee pointed out that dry drilling takes place here; the machinery is self-contained. The air compressor in the back of the shop was enclosed; an adjacent bucket was positioned to catch water. A suction hose draws vapors out of the shop through the ceiling. There was formerly an oil-fired furnace where the air compressor is currently located. We inquired about the existence of underground storage tanks. Mr. Lee said that he was not aware of any on his property.

Inside the welding shop is a storage room for transmission and hydraulic fluids. Fuels and other flammable materials are stored inside a separate cabinet. Oil from welding operations is taken to Service Fuel, a neighboring business in the Penn Plaza Industrial Park.

A sandblasting shed is located southwest of the shop area. Mr. Lee told us that he uses de-arsenized copper slag approved by EPA, and that most of the sandblasting takes place inside the shed or underneath a tarp. Although there was no sandblasting in progress on the day of this inspection, we observed an accumulation of one to two inches of sandblast grit outside the shed. When we pointed out this layer of sandblast grit, Mr. Lee replied some of the grit escapes but the yard is swept every three months and a contractor hauls the grit to a landfill. We told Mr. Lee that he will need to dispose of the grit that has accumulated because copper, zinc and nickel are found in de-arsenized grit and these metals can leach out of the grit. He will also need to prevent future outdoor accumulations of grit. We observed a similar accumulation of sandblast grit in the lower yard, south of the shed. Mr. Lee said that the lower yard is not his property.

We inquired about the types of hazardous wastes generated at Lee Fabricators. Mr. Lee said that the only wastes generated are ketones and paint sludges. We observed outdoor storage of sealed paint sludge drums in an uncovered, unbermed area west of the shop buildings. Mr. Lee told us that this is an eight month accumulation of drums and he will contact a disposal facility in Port Townsend or Tacoma to take away the drums. Dan Cargill informed him that he will need a hazardous waste generator number and will need to use manifest forms to track the disposal of the hazardous wastes.

We continued the discussion in the main office of the facility. Mr. Lee expressed frustration about the cost of complying with environmental regulations and said that he tries to run a clean operation.

We gave Mr. Lee the following educational materials: (1)

Inspection Report - 5/13/92
Lee Fabricators
Page 3

Hazardous Waste Services Directory, (2) Hazardous Waste - A Management Guide for Local Businesses, (3) NPDES Stormwater Permit Regulations, and (4) Machine Shop Facts. We departed the facility at 10:10 AM.

Attached are a photo taken on the day of the inspection as well as photos taken on November 13, 1991. On that day, we walked by the facility but did not conduct a formal inspection.

Fran Solomon

Fran Solomon, Inspector
Toxics Cleanup Program



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000

May 13, 1992

CERTIFIED MAIL

Mr. Darrell Lee
Lee Fabricators
Penn Plaza Industrial Park
1725 Pennsylvania Avenue
Bremerton, Washington 98310

Dear Mr. Lee:

Re: WARNING LETTER

On January 22, 1992, Dan Cargill and I inspected your facility. During the inspection, we identified a few problems that require your attention. The enclosure entitled "Water Pollution Laws and Regulations" contains a summary of the applicable laws and regulations related to the discharge or potential discharge of pollutants to waters of the state. The following discussion describes potential water quality violations and current hazardous waste regulations which must be addressed by Lee Fabricators.

On the day of the Inspection, we observed an accumulation of one to two inches of sandblast grit outside the sandblasting shed. The copper, zinc and nickel found in de-arsenized copper slag can leach out of sandblast grit and discharge into Port Washington Narrows. This is a violation of the state Water Pollution Control Law which prohibits discharge of pollutants to waters of the state. In order to prevent the potential discharge of toxic metals to water, Lee Fabricators will need to conduct all sandblasting inside the shed or underneath a tarp. If you have any questions on what kinds of tarps to use for sandblasting large objects, contact Claude Williams at Puget Sound Air Pollution Control Agency at 296-7445.

Lee Fabricators will also need to test the grit that has accumulated to determine if it designates as a dangerous waste under Washington State Dangerous Waste Regulations (chapter 173-303 WAC). Analytical laboratories are listed in two documents that I gave you on the day of the inspection: Hazardous Waste Services Directory and Hazardous Waste - A Management Guide for Local Businesses. If the grit designates as dangerous waste, it needs to be disposed of at an off-site permitted facility. If the grit is not dangerous waste, contact Western Services (671-7035) to arrange for recycling. Enclosed is information on disposal of sandblast grit, from Best Management Practices For Ship And Boat Building And Repair Yards, BMP 20.

Mr. Darrell Lee
Page 2
May 14, 1992

During the inspection, we observed outdoor storage of sealed paint sludge drums in an uncovered, unbermed area west of the shop buildings. You indicated that this is an eight month accumulation of drums and you will contact a disposal facility in Port Townsend or Tacoma to take away the drums.

According to the state Dangerous Waste Regulations, up to 2,199 pounds of hazardous waste may be stored on site for a maximum of 180 days. Since Lee Fabricators has accumulated a larger quantity of hazardous waste and for a longer period of time, the facility is now considered a regulated generator. We appreciate your promptness in applying for and obtaining a hazardous waste generator number from the Washington Department of Ecology. You will need to use the Uniform Hazardous Waste Manifest Form to send Lee Fabricators' hazardous waste to an off-site permitted facility. Manifest forms are available from hazardous waste disposal facilities. For more information on regulatory requirements for hazardous waste generators, refer to the enclosed packet - Step By Step; Fact Sheets For Hazardous Waste Generators. If you have any questions on the information in the packet, call Michelle Underwood (649-7271) or Dave Hohmann (649-7137) in Ecology's Solid and Hazardous Waste Program.

All drums and containers of paint sludges, ketones, or other hazardous materials must be properly labelled and stored on covered, bermed, impervious surfaces to prevent contact with rainwater and to prevent any spills or leaks from entering soil, groundwater, or Port Washington Narrows. Enclosed is guidance on proper container storage from the City of Seattle's Water Quality Best Management Practices Manual, BMP 1.50.

Since this was the first inspection of Lee Fabricators, I propose the following schedule for correcting the observed problems in lieu of initiating formal enforcement action.

1. Within fifteen working days of receipt of this letter, Lee Fabricators will advise the Department of Ecology in writing, of whether or not it will take appropriate voluntary action to prevent the discharge of pollutants from the facility and to implement the required best management practices. Failure to do so will make Lee Fabricators subject to enforcement proceedings and potential fines under the state Water Pollution Control Law (RCW 90.48) and the state Dangerous Waste Regulations. Upon receipt, the Department of Ecology will stay the initiation of formal action and will continue to stay such action as long as Lee Fabricators makes a good faith effort to correct the deficiencies noted above.
2. Within forty-five working days of receipt of this letter, Lee Fabricators will submit the following to the Department of Ecology: (a) a plan and schedule for testing and disposal of sandblast grit, and the names and addresses of the testing and

Mr. Darrell Lee

Page 3

May 14, 1992

disposal facilities; (b) a description of containment and control measures that will be taken for sandblasting inside the shed and for large items blasted outside of the shed; (c) a schedule for disposal of the accumulated hazardous wastes under the state Dangerous Waste Regulations; and (d) a plan and schedule for providing a covered, bermed storage area for hazardous wastes.

All corrective actions are subject to on-site verification by the Washington Department of Ecology. Followup inspections will not be announced in advance. Please contact me at 649-7219 if you have any questions about the above requirements.

Sincerely,

Frances Solomon

Frances Solomon, Ph.D.

Coordinator

Sinclair/Dyes inlets Action Team

FS:fs

- Enclosures:
1. Water Pollution Laws and Regulations
 2. BMP 20, Disposal of Sandblast Grit
 3. Fact Sheets For Hazardous Waste Generators
 4. BMP 1.50, Container Storage

cc: Michelle Underwood, Ecology, Solid and Hazardous Waste Program
Dave Hohmann, Ecology, Solid and Hazardous Waste Program



RECEIVED

MAY 29 1992

DEPT. OF ECOLOGY

P.O. Box 4307 Bremerton, Washington 98312 Phone (206) 373-5043

May 19, 1992

Ms. Frances Solomon
STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
N.W. Regional Office
3190 - 160th Avenue SE
Bellevue, WA 98008-5452

Dear Ms. Solomon:

RE: YOOR LETTER OF MAT 13, 1992

In response to the schedule you propose for correcting observed problems in lieu of formal enforcement action:

1. This letter will serve to inform you, within 15 days, of LEE FABRICATORS Intentions and/or already completed actions in our efforts to prevent the discharge of pollutants from our facility.

We would like to take this opportunity to let you know that the preventative measures we are taking are being done as much because of our concern for the environment as the threat of formal action being taken against us.

2. We understand from information provided by KLEENBLAST, our supplier of sandblast grit, that the grit we are using has EPA approval. LEE FABRICATORS switched to this considerably more costly sandblast material specifically because it was environmentally harmonious.

You will note the attached letter from BIOASSAY TESTING SERVICES indicates the sandblast material we are using is "unclassified" and specifies "in Washington State". Based on this

DEPARTMENT OF ECOLOGY
May 19, 1992

PAGE 2

information, LEE FABRICATORS has not planned or implemented specific disposal or containment measures.

Prior to your inspection, we were sorting through regulations attempting to deal with our accumulation of the sealed paint sludge drums; as you observed, the sludge drums were properly sealed and stored on pallets off the pavement. Also as noted, we promptly applied for and received a hazardous waste generator number and, in addition, contacted SOL-PRO, INC., a hazardous waste management company to dispose of all filled sludge drums. LEE FABRICATORS has taken measures to insure we will not again exceed the maximum of 2,199 pounds-180 days.

It is LEE FABRICATORS' intention to conduct our business in as efficient and cost-effective manner possible without deliberately adversely affecting the quality of air or water with pollutants. If after reviewing the attached information, you can site areas where we are still not complying with Department of Ecology regulations, we would be open to your recommendations.

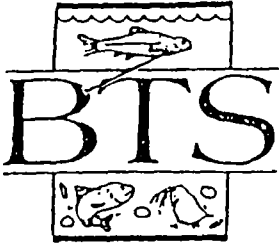
If we do not receive a response within 15 days, we will assume the corrective actions we have already taken and sandblast grit test results we have supplied, place LEE FABRICATORS in a position of compliance with Department of Ecology regulations.

Very truly yours,



DARRELL D. LEE
PRESIDENT

/bf
Enc.



Christopher L. Getchell
8455 S. 19th Suite 120
Tacoma, WA 98465
206-565-5492

BIOASSAY TESTING SERVICES

Acute and Chronic Toxicity Testing

Joe Schmidt
Kleen Blast
1448 St. Paul Ave.
Tacoma, WA 98421

Dear Joe,

Included are the bioassay results on your samples Kleen Blast #16/30 raw and Tru-Grit heavy grade. The testing was performed following DOE 173-303, method 80-12 testing requirements designed to classify material as either dangerous waste, extremely hazardous wastes or non classified as far as bioassays are concerned. This testing is required by the Washington State Department of Ecology before material can be disposed of, either in landfills or by other means.

Please note that the testing I performed did not duplicate the testing performed by the Canadian labs that was in the information you mailed me after the tests had begun. In the testing I performed the trout were exposed to your materials at concentrations of 100 and 1000ppm(.01 and .1%). The testing performed in Canada exposed trout to concentrations ranging from 1000 to 100000ppm(.1 to 10%). If you would like to duplicate the work that was performed in Canada the tests would have to be repeated at higher concentrations of your material. Since they exposed the trout to a variety of concentrations you would need to select the concentration that would satisfy their requirements to avoid unnecessary testing and additional expense.

The results of your material showed 5 out of 30 trout mortalities in the 1000ppm exposure of the Tru-Grit heavy grade material and 1 out of 30 mortalities in the 1000ppm exposure of the Kleen Blast #16/30 raw. There were no mortalities in either of the 100ppm exposures. The results indicate that your material is unclassified as far as bioassays are concerned in Washington State. There would have had to have been 11 mortalities before the state would have imposed any restrictions.

If you have any questions about the information or you want to perform any additional testing please do not hesitate to give me a call. I appreciated the opportunity to perform this work for you.

Sincerely,

Christopher L. Getchell
Oceanographer/Biologist

BIOASSAY TESTING SERVICES
8455 So. 19th
Tacoma, WA 98465
(206) 565-5492

STATIC ACUTE FISH TOXICITY TEST

Customer Name: Kleen Blast
Address: 1448 St. Paul Ave.
Tacoma, WA 98421

Contact: Joe Schmidt
Phone: (206)383-2168

Sample Identification: Kleen Blast #16/30 raw
Analysis Performed: Hazardous Waste Characterization

TEST METHOD:

1. Toxicity test method used:
Salmonid survival test- "General Procedure for Static-Bioassay to Evaluate Industrial Effluent Toxicity," Washington Department of Ecology. Revised January 24, 1984; and Biological Testing Methods. Part A, Static Acute Fish Toxicity Test." DOE 80-12. Revised July 1981.
2. End point(s) of test:
Mortality or 96 hours
3. Deviations from reference method, if any, and the reason(s):
No deviations
4. Date and time test started:
3/21/90, 2000hrs
5. Date and time test terminated:
3/25/90, 2000hrs
6. Type of test Chamber:
Glass chamber, 20"X10"X15"
7. Volume of solution used/chamber:
30 liters, 13" deep.
8. Number of organisms/test chamber:
10 organisms
9. Number of replicate test chambers/treatment:
3 replicates
10. Acclimation of test organisms (mean and range):
30 days, 10 to 90 days
11. Test temperature (mean and range):
12 degrees centigrade, (11.8, 11.5-12.4)

TEST ORGANISMS:

1. Scientific name:
Salmo gairdneri(rainbow trout)
2. Age:
34 days
3. Life stage:
Fingerling
4. Mean length, weight, and loading:
2.1cm, .38gms
5. Source:
Cascade Rainbow Trout Fish Farm
6. Food:
Trout chow
7. Lighting:
16 hours light, 8 hours dark, 50 to 100 foot candles
8. Diseases and treatment:
No diseases detected, no treatment necessary
9. Dilution water used in test:
Dechlorinated and aged municipal water

CHEMICAL ANALYSIS:

1. Physical and chemical methods used:
 - a. Temperature-Digital temperature probe
 - b. Dissolved oxygen-Membrane Electrode/Azide Modification
 - c. pH-Standard electrode
 - d. Conductivity-Conductivity meter
 - e. Hardness-Titrimetric/EDTA
 - f. Alkalinity-Titrimetric/Phenolphthalein-Sulfuric acid
 - g. Weight-Beam balance
 - h. Residual chlorine-Colorimetric/Ortho-tolidine
 - i. Ammonia-Colorimetric/Nesslerization
 - j. Nitrate-Colorimetric/Cadmium reduction

RESULTS:

1. Concentration:
 - a. 1000 mg/l(ppm)
 - b. 100 mg/l(ppm)
 - c. Control
2. Observed effects:
 - a. 1/30 mortalities
 - b. 0/30 mortalities
 - c. 0/30 mortalities
3. Raw biological data, including daily records of affected organisms in each concentration(including controls):
 - a. See appendix "A"
 - b. See appendix "A"
 - c. See appendix "A"
4. Summary table of physical and chemical data:
 - a. See appendix "A"
 - b. See appendix "A"
 - c. See appendix "A"

DATA SHEET FOR STATIC BASIC ACUTE FISH TOXICITY TEST

Laboratory Bioassay
Analyst Chris White

Industry/Toxicant Kleen Blat
Address 1448 St Paul Ave
Collector Joe Schmidt
Date Sample Collected 3/21/90

Beginning Date 3-21-90 Time 20:00
Ending Date 3-25-90 Time 20:00
Test Organism 12005, Rainbow
Required Test Temperature Range 12°C ± 1.5

Laboratory Reference Number	Test Container No.	Conc. (mg/l)	Number of Cumulative Deaths					Dissolved Oxygen (mg/l)					pH 25°C					Temperature (°C)					Total Hardness (mg/L)		Total Alkalinity (mg/L)		Conductivity µMHO/cm	
			0	24	48	72	96	0	24	48	72	96	0	24	48	72	96	0	24	48	72	96	0	96	0	96	0	96
control	13	0	0	0	0	0	0	12.1	11.3	10.2	9.9	9.5	7.34	—	—	6.89	11.5	11.9	11.9	11.9	11.9	20	20	40	40	50	50	
	43	0	0	0	0	0	0	12.3	11.2	10.0	9.9	9.6					11.8	11.9	12.0	12.0	11.9							
	63	0	0	0	0	0	0	12.3	11.1	9.9	9.7	9.4					12.0	12.0	11.9	11.9	11.9							
16/30 raw	49	100	0	0	0	0	0	11.7	9.3	8.3	7.9	7.7	7.34	—	—	7.01	11.9	12.0	12.0	12.0	12.0	20	20	40	40	50	50	
en Blot	18	"	0	0	0	0	0	11.7	8.8	7.3	6.9	6.9					12.0	12.0	12.0	12.0	12.0							
	34	"	0	0	0	0	0	11.7	8.6	8.7	8.4	8.1					12.1	12.4	12.2	12.0	12.1							
	12	1000	0	0	0	0	0	11.6	9.7	9.9	9.6	9.3	7.34	—	—	7.0	11.7	12.0	12.0	12.0	11.9	20	20	40	40	50	50	
	24	"	0	0	0	0	1	11.6	9.7	9.8	9.4	9.3					11.8	12.0	12.0	12.0	12.0							
	71	"	0	0	0	0	0	11.6	10.6	9.8	9.5	9.3					11.8	12.0	12.0	11.8	12.0							
subit	39	1000	0	0	0	0	0	11.7	8.8	8.1	7.5	7.5	7.34	—	—	7.01	11.9	12.0	12.0	12.0	11.9	20	20	40	40	50	50	
easy Grade	9	"	0	0	0	0	0	11.7	10.7	10.0	9.6	9.3					11.9	12.0	11.9	12.0	12.0							
	19	"	0	0	0	0	0	11.7	10.8	10.0	9.5	9.5					11.8	12.0	11.7	11.9	11.9							
	30	1000	0	0	1	1	1	11.7	10.0	9.1	8.8	8.8	7.34	—	—	7.01	11.6	11.9	12.0	12.0	11.8	20	20	40	40	50	50	
	14	"	0	0	0	0	0	11.7	9.0	8.4	7.8	7.8					11.5	11.9	11.9	11.9	11.8							
	32	"	0	0	2	2	4	11.7	10.6	9.7	9.4	9.4					11.4	12.0	11.8	11.5	12.0							

Sample Description Sand blasting sand
Average Weight 51 gm Mean Length 3.6 cm Longest 3.9 Shortest 2.8 Ratio long/short 1.4
Number of organisms per chamber 10 Ratio of fish to water 1.7 gm/l Comments Surviving fish took on

Method on file with the Department of Ecology:

GENERAL PROCEDURE FOR STATIC BASIC ACUTE FISH TOXICITY TEST

DATA VERIFIED BY CG

DATE 3/2/90

ELI W > 10/30



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000

June 26, 1992

CERTIFIED MAIL

Mr. Darrell D. Lee
President
Lee Fabricators
P.O. Box 4307
Bremerton, Washington 98312

Dear Mr. Lee:

Thank you for your letter postmarked May 29, 1992, informing me that your facility has disposed of the accumulated paint sludge drums and providing me with the bioassay test results for Kleen Blast grit. I am pleased to know that Lee Fabricators is implementing pollution prevention measures because of your concern for the environment. This letter summarizes additional pollution prevention measures that Lee Fabricators must implement in order to be in compliance with environmental regulations.

In our telephone conversation of May 18, you indicated that you are building a covered, bermed area for storage of paint sludges. What is the schedule for completion of this secondary containment area?

The U.S. Environmental Protection Agency does not formally approve sandblast grit. Although Kleen Blast grit is dearsenized and does not designate as a dangerous waste in terms of fish mortality, the grit is still a potential source of pollutants to waters of the state. Rainwater in western Washington is acidic, with a pH range of 4.5 - 4.8. Metals such as copper, zinc and nickel can leach out of the grit and discharge into groundwater or Port Washington Narrows. To prevent this potential violation of the state Water Pollution Control Law, Lee Fabricators will still need to implement containment and disposal measures for the sandblast grit.

The Bremerton-Kitsap Health District Solid Waste Regulations require disposal of all solid wastes within seven days of production. Sandblast grit can be disposed of at the Olympic View Landfill if the grit does not designate as a dangerous waste under the Toxicity Characteristic Leaching Procedure (TCLP) test. According to Washington State Dangerous Waste Regulations (Chapter 173-303-170 (a)), Lee Fabricators will need to conduct a TCLP test on three samples of the accumulated grit. The Hazardous Waste Services Directory and Hazardous Waste - A Management Guide for Local Businesses contain lists of analytical laboratories.

Mr. Darrell D. Lee
Page Two
June 26, 1992

If you have any questions about the dangerous waste regulations, call the Washington Department of Ecology at 649-7000 and ask to speak to a hazardous waste Inspector. If the grit does not designate as a dangerous waste with the TCLP test, contact Rich Mullen at 455-2550 to arrange for disposal at the landfill. Another option is to contact Western Services (641-7035) to arrange for recycling of the grit. If the grit designates as dangerous waste, it needs to be disposed of at an off-site permitted facility.

Within one month of receipt of this letter, please submit the following to the Department of Ecology: (a) a plan and schedule for testing and disposal of sandblast grit, and the names and addresses of the testing and disposal facilities; (b) a description of containment and control measures that will be taken for sandblasting inside the shed and for large items blasted outside of the shed; and (c) a schedule for completion of the covered, bermed storage area for paint sludges.

If you have any questions about the information and requirements in this letter, please contact me at 649-7219.

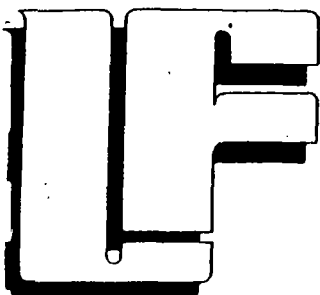
Sincerely,

Fran Solomon

Fran Solomon
Toxic Cleanup Program

FS:tm

cc: Michelle Underwood, Ecology, Solid and Hazardous Waste Program
Dave Hohmann, Ecology, Solid and Hazardous Waste Program
Robin Harrover, Ecology, Solid and Hazardous Waste Program



LEE FABRICATORS

RECEIVED

JUL 28 1992

DEPT. OF ECOLOGY

P.O. Box 4307 Bremerton, Washington 98312 Phone (206) 373-5043

July 24, 1992

Ms. Frances Solomon
STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
N.W. Regional Office
3190 - 160th Avenue SE
Bellevue, WA 98008-5452

Dear Ms. Solomon:

RE: YOUR LETTER OF JUNE 26, 1992

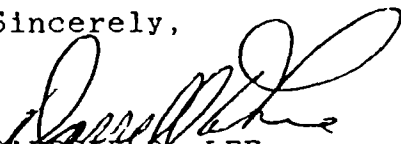
In response to your summary of additional preventative measures that LEE FABRICATORS must implement in order to be in compliance with environmental regulations:

- a. We are currently evaluating a plan and schedule for testing and disposal of sandblast grit. Upon completion of our evaluation, we will submit the names and addresses of the testing and disposal facilities. As you are aware, we were led to believe our KLEENBLAST sandblast grit was environmentally safe and no additional containment/disposal measures were necessary. Therefore, we weren't prepared to undertake the additional measures as outlined.
- b. Containment and control measures for sandblasting inside and outside are being assessed for both efficiency and effectiveness.
- c. The 55 gallon drums of paint sludge will be contained inside a secondary recovery drum prior to shipment.

We will continue to keep your Department informed as our evaluations become solid plans and schedules.

In order to better understand our requirements, we would appreciate you forwarding LEE FABRICATORS copies of the specific regulations which you feel we are not currently in compliance with.

Sincerely,


DARRELL B. LEE
PRESIDENT

/bf

April 14, 1992

Mr. Michel Henrie
OCL Industrial Materials Ltd.
13364 Comber Way
Surrey, B.C. V3W 5V9

Dear Mr. Henrie:

Re: Results of Metal Testing of Kleen Blast Product

Envirochem Services Ltd. has completed total metal analysis and leachate quality testing of an abrasive material used for sandblasting and marketed under the tradename "Kleen Blast" by OCL Materials Ltd. The metal analysis was carried out to determine if the sandblasting abrasive would be classified as a "Special Waste" as defined in the B.C. *Special Waste Regulations* if the material was no longer used for its original purpose (ie., spent sandblasting material).

The B.C. *Special Waste Regulation* depends on the *Transportation of Dangerous Goods Regulations* (TDG) to classify most special waste. Therefore, dangerous goods as defined in section 2 of the *Transportation of Dangerous Goods Act* and as regulated in the federal regulations are classified as special waste. For materials containing metals as the potential parameter of concern, four metal compounds are listed in List II of Schedule II of the TDG Regulations: arsenic, cadmium, soluble lead and mercury. The four metal compounds are listed in the TDG as environmentally hazardous substances with a 9.2 classification. The classification system describes and codifies the hazards associated with the waste. The B.C. *Special Waste Regulation* specifies that an environmentally hazardous substance with a 9.2 classification is a dangerous good if the concentration of that substance is greater than 0.01% (100 ppm).

In order to determine whether the sandblasting abrasive Kleen Blast would be classified as a special waste, a sample was submitted for total metal analysis to determine the quantity of each of the four regulated metals present in the sample. The sample was analyzed by ICP following a total digestion method with aqua regia (a mixture of nitric acid and hydrochloric acid). The analytical results are shown in the attached table. The results indicate that the Kleen Blast abrasive sample does not contain arsenic, cadmium, lead or mercury in concentrations in excess of 100 ppm, or 0.01%. Therefore, the Kleen Blast abrasive sample would not be classified as a special waste, as defined in the B.C. *Special Waste Regulation*.



E.H. HIGGINS
Engineering Ltd.
Environmental Engineering

E. R. Higgins, P. Eng.

127A Kootenay St. N., Cranbrook, B.C. V1C 3T5

Bus. 426-8616, Fax. 426-8488, Res. 426-5361

August 25, 1993

RECEIVED

AUG 30 1993

DEPT OF ECOLOGY

Joanne Polayes-Wien
Washington Dept. of Ecology
Northwest Regional Office
3190 160th Ave. S.E.
Bellevue, Washington
U.S.A. 98008-5452

Dear Ms. Joanne Polayes-Wien:

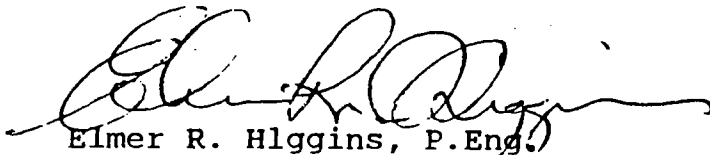
re: Kleen-Blast Abrasive

This letter is a follow-up of our conversation of August 24/93 concerning spent Kleen-Blast abrasive sand.

I enclose our most recent data showing "Leachable Metal" as reported by one of the labs doing work for us in Canada. The covering letter gives a brief description of the test procedure.

I hope that the test covers an adequate range of metals for your purpose. If you have questions please contact John Ketrenos and I will phone you.

Yours truly,



Elmer R. Higgins, P.Eng.

Encl.

The sandblasting abrasive Kleen Blast was also tested for leachate quality using the "leachate Extraction Procedure" as described in Part 1 of Schedule 4 of the *B.C. Special Waste Regulation*. The test results show that the sandblasting abrasive does not produce an extract with metal contaminant concentrations exceeding the leachate quality standards as prescribed in Table 1 of Schedule 4 of the *B.C. Special Waste Regulation*. Therefore, the Kleen Blast abrasive sample would not be classified as a "leachable waste" or a special waste as defined in the *B.C. Special Waste Regulation*.

I hope this information meets your needs. Please contact the undersigned if you have any questions or concerns regarding the testing methods or interpretation.

Yours truly,

ENVIROCHEM SERVICES



Eva Gerencher, M.Sc.,
Project Manager

JUL 23 '93 12:59PM OCL INDUSTRIAL LTD

P.1/1

April 14/92

OCL INDUSTRIAL MATERIALS LTD.
RESULTS OF TOTAL METAL AND LEACHATE ANALYSIS
ON "KLEEN BLAST" SANDBLASTING ABRASIVE

Parameter	Total Metal	"Leachable" Metal	B.C. MOE Leachate Quality Standards	Total metals Soil MTCA Cleanup level method A method B
Arsenic	< 9	0.04	5	5 ✓
Barium	629	< 0.02	100	5,600 ✓
Cadmium	< 0.09	< 0.0003	0.5	5 ✓
Chromium	146	0.014	5	500 ✓
Cobalt	40.5	< 0.001	-	none
Copper	1870	0.938	-	592 ✓
Lead	< 2	< 0.004	5	5 ✓
Mercury	< 0.01	< 0.001	0.1	5 ✓
Molybdenum	< 0.5	< 0.003	-	400 ✓
Nickel	22.5	0.002	-	320 ✓
Selenium	< 0.9	< 0.02	1	80 ✓
Zinc	149	0.036	-	4,800 ✓

< = Less than detection limit

Results are expressed as milligrams per dry kilogram and milligrams per liter



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000

December 16, 1993

CERTIFIED MAIL
P 874 464 965

Mr. Paul McConkey
American Marine Industries, Inc.
1500 Thompson Drive
Bremerton, WA 98310

Re: Penn Plaza Industrial Park and Adjacent Properties

Dear Mr. McConkey:

The Department of Ecology inspected the following properties between July 15, 1993 and August 19, 1993: Pier 44 Construction, CB Concrete, Lee Fabricators, Service Fuel Maintenance Facility, and an unnamed boat maintenance facility. It is my understanding that you are the owner of these properties. During our inspections, we observed several situations which have a substantial potential to cause water pollution, in violation of the State of Washington Water Pollution Control Law, RCW 90.48.080.

A. CB Concrete Products

At the time of our inspections, CB Concrete had a large pile of waste concrete stored on the site. When rain water leaches through concrete dust, the water picks up concrete residues which can make it caustic in potential violation of water quality standards. Residues of run-off from the concrete pile were clearly visible leading to the nearest storm drain, which discharges directly to Port Washington Narrows. Such a discharge constitutes a violation of the State Water Pollution Control Law, Chapter 90.48.080 RCW. To prevent potential water quality violations, waste concrete must be stored under cover and surrounded by a berm, to prevent contact with storm water.

There also were several dozen drums accumulated on the CB Concrete site. We were told that the drums were empty but had contained fiberglass resin. These drums need to be inventoried, checked to see that they are in-fact empty, and disposed of properly.

In addition, there were two waste oil drums stored outside under an overhang, but without secondary containment. Secondary containment is necessary for liquids stored outside to ensure that any spills or leaks do not contaminate the ground or get into the storm drains. Specifications for providing secondary containment are outlined in the enclosed excerpt from the Stormwater Management Manual for the Puget Sound Basin, "BMP SI.50 Container Storage of Liquids, Food Wastes, or Dangerous Wastes".

B. Pier 44 Construction

This site had a large pile of concrete waste along the back fence of the property. At the time of our inspection, a concrete truck was parked there dripping liquid. Workers later washed out the truck's concrete shoot with a garden hose, allowing the liquid to discharge to the ground. It appeared that the runoff from this operation ran onto the neighboring property. The discharge of this waste water to the ground without a state discharge permit constitutes a violation of the State Water Pollution Control Law, 90.48 RCW and implementing regulations contained in Chapter 173-216 WAC. The enclosed "Water Pollution Laws and Regulations" information sheet summarizes pertinent sections of that law.

We observed that the ground around some of the steel forms was stained with diesel oil used as a release agent. We were told that only about five gallons of diesel a month are used for this purpose; however, over time the small amount spilled on the ground could add up to significant contamination. In the interest of avoiding future cleanup problems, it would be in your best interest to provide covered areas and containment for all the forms when they are being used.

The remainder of the site was littered with steel forms; empty and partially filled drums; steel, styrofoam, and concrete scrap; tires, and other debris. The storage of unlabeled, open drums without proper containment constitutes several violations of the State Dangerous Waste Regulations (Chapter 173-303 WAC). These wastes must be designated and disposed of properly. There was also a drum of acrylic sealant stored without secondary containment.

C. Lee Fabricators

Lee Fabricators uses de-arsenized copper slag for sand-blasting metal. The spent slag is not contained within the sand blast shed. At the time of our inspections, several inches covered the ground outside of the shed. Piles of what appeared to be spent slag were also located at a low area of the site near the embankment that goes down to Port Washington Narrows.

While Ecology has been provided with information showing that the new slag does not readily leach metals, the spent slag has not been tested. The generally accepted best management practice for handling sand blasting materials is to provide containment by confining all materials inside a permanent building or a tarped enclosure, with daily cleaning to prevent material from migrating outside the enclosure or coming in contact with storm water. Mr. Lee has said that he plans to have the area cleaned on a monthly basis, but is not willing to implement best management practices.

D. Drum piles

There are piles of 55 gallon drums at various locations around the Penn Plaza property. Some of the drums had open bungs and appeared to contain a dark oily substance. The drums are generally unlabeled as to their content, and some may be empty. Since there are no obvious owners of these drums, you as property owner are responsible for their proper disposal unless you can get any of your tenants to claim responsibility. Empty drums should be sent to a drum recycler. Drums with unknown contents must be handled as if they contain dangerous waste until it is determined otherwise through appropriate testing.

Allowing drums of dangerous waste to accumulate indefinitely, without proper labeling or containment, constitutes a violation of several provisions of the State Dangerous Waste Regulations (Chapter 173-303 WAC). If the drums contain waste oil that does not designate as dangerous waste, such storage still presents a threat to water quality in case of overflow or leakage of the drum contents, potentially violating the State Water Pollution Control Law (90.48.080 RCW) and the State Oil and Hazardous Substance Spill Prevention and Response Law (90.56.320 RCW). The enclosed hazardous waste fact sheets summarize hazardous waste generator requirements for designation, transport, and disposal of hazardous wastes. The Hazardous Waste Services Directory, also enclosed, will help you locate a hazardous waste or waste oil transporter.

F. Soil and Groundwater Contamination

You should be aware that any soil and groundwater contamination resulting from mishandling of oil and other wastes could result in liability for cleanup of the site under the state Model Toxics Control Act (MTCA). Also, in the event you want to sell your property, such contamination could make property transfers difficult. The enclosed MTCA fact sheets provides more information.

Paul McConkey
Page 4
December 16, 1993

Our research has revealed that the Penn Plaza property was formerly the site of a coal gasification plant. Other coal gasification sites in the state have been found to be contaminated. Consequently, your property is being considered for further investigation under MTCA.

G. Boat Dock and Ramp

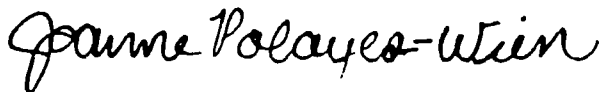
We observed a dock adjacent to the shore accessed from your property via a wooden board leading to a ramp held up by wires suspended from a crane. This setup presents obvious safety concerns, which I have reported to the Department of Labor and Industries. I also have brought the situation to the attention of the Bremerton Building Department.

H. Other Businesses

Several other businesses besides those mentioned are located on the property, but they lack signs or other means of identification. We were told that one of the businesses is an electroplating operation, which presents a particular concern because of the hazardous chemicals used. During an inspection, a tenant reported that unknown substances illegally discharged into the storm drainage system had backed up onto the Penn Plaza lot. In order to trace the potential source of such discharges, a complete listing of tenant businesses is needed so that we can investigate their waste disposal practices. I recognize that off-site sources could also be responsible for the reported discharge.

We would appreciate your immediate attention to the problems outlined above. Please provide a list of all Penn Plaza tenants, including names, addresses and telephone numbers. The list should be sent as soon as possible to my attention at the above address. Once I have received the list of tenants, Ecology will be doing more inspections on the site. Please contact me at (206) 649-7233 if you have any questions.

Sincerely,



Joanne Polayes-Wien
Inspector

JPW:jpw
Enclosures

Penn Plaza Industrial Park
1500 Thompson Drive
Bremerton, Wa. 98310

January 11, 1994

Lee Fabricators
P.O. Box 4307
Bremerton. Wa. 98312.

Dear Darrell:

I recently received a letter from the Dept. of Ecology
outlining certain problem practices involving our property.
I have enclosed a copy which should be self explanatory.

Please take appropriate action to rectify the problem.

Call me if I can be of help.

Sincerely,

Paul McConkey

DEPARTMENT OF ECOLOGY
INSPECTION REPORT

UBI #:		
FACILITY NAME: Lee Fabricators		
CONTACT: Darrell Lee	TELEPHONE:	
ADDRESS: 1723 Pennsylvania Ave., P.O. Box 4307		
CITY: Bremerton	COUNTY: Kitsap	ZIP: 98312
TYPE OF FACILITY: Sand blast and metal fabrication		
RECEIVING WATER: Port Washington Narrows		
OTHER DISCHARGE:		
TREATMENT SYSTEMS:		
NPDES/STATE PERMIT NO:		
PERMIT EFFECTIVE DATE:		
PERMIT EXPIRATION DATE:		
HAZARDOUS WASTE GENERATOR No:		
SIS I.D. NUMBER:		
INSPECTOR: J. Polayes-Wien/M. Turvey		
DATE OF INSPECTION: August 19, 1993		
DATE OF REPORT: August 24, 1993		
PURPOSE OF INSPECTION: Source control, follow-up		
TYPE OF INSPECTION: Unannounced		

NARRATIVE: We arrived at the facility at 9:08 a.m. and introduced ourselves to the receptionist, who said we should speak to Mr. Lee. I explained the purpose of our inspection, and expressed concern about the spent sand-blasting slag left exposed on the ground, as I had seen during previous inspections of adjacent businesses. Mr. Lee said that he did not have time to show us his facility and that he was sick and tired of being picked on for his slag, which he said he purchases at considerable expense specifically because it is approved by the U.S. (sic) Department of Ecology. We said that the Department of Ecology does not approve products for sand-blasting. Mr. Lee said that he had submitted analytical test results on the slag which showed that it is environmentally benign. I said that the bioassay test results submitted were on clean as opposed to spent grit, and that no leaching test results were submitted. Mr. Lee again said that he felt he was being picked on for a minor problem in an area where there are lots of serious environmental problems. He said that during a recent rain storm, a green gooey substance from an unknown source oozed up out of the storm drains at his facility. He also said that about a year ago, someone had towed in a corroded steel platforms and left them on the waterfront along the bank below Penn Plaza. He said that he had pointed the platforms out to a previous Ecology inspector, but no-one had ever done anything about it. As another example, Mr Lee said that the county had just paved a road with asphalt with drainage that leads directly to the bay, without oil-water separation. He asked what we do about do-it-yourselfers who dump waste oil into the storm drain.

Mr. Lee then said he would show us the facility. We proceeded outside in the yard, where Mr. Lee pointed out the two catch basins where the green gooey substance backed up. One of the drains appeared clogged with debris, and there was residue on the grate covering it. There were several buildings surrounding the paved lot, some of which were part of Lee Fabricators operation, and some of which were leased by other companies. Mr. Lee said that Paul McKonkey is the owner of the entire property.

Mr. Lee said that his shop buildings are below grade, so he had put in a french drain to keep storm water out of the shops. Otherwise, he said the shops have no drains.

We then proceeded to the area outside the sand-blast shed, where spent slag had accumulated on the ground, uncontained. Mr. Lee picked up some of the spent slag and demonstrated how heavy it is, falling to the ground without creating much dust. Mr. Lee said that Kleenblast Corp., the manufacturer, has tested this material extensively and that it is used at Puget Sound Naval Shipyard. He said that Puget Sound Air Pollution Control Agency had been out to his facility, and did not have a problem with the slag being left out in the open, because it does not create dust. Mr. Lee said that they will be contracting with a street sweeper to do a final cleaning of the yard, after they sweep up the slag once a month. He also said that there is a low area in the yard that tends to collect rain water and any slag that runs off before it gets to Port Washington Narrows.

Mr. Lee explained that the blasting is used to remove mill scale from the metal surface, roughing it up so that coatings will stick. I asked what sort of coatings were used. Mr. Lee said that they spray on paint. In response to my question about cleaning the spray guns, he said that they clean the spray guns with MEK. He said that 99 percent of their hazardous waste is MEK and paint sludges from cleaning the spray guns. The MEK and paint sludges are collected in drums, which are stored mostly inside, and shipped out for disposal. He said he has obtained a hazardous waste generator number, even though he doesn't regularly generate enough waste to require it. I pointed out that in the previous inspections he had accumulated enough wastes to require a generator number to legally dispose of them. He conceded that was the case.

In a corner next to the fence, on the opposite side of the yard from the office, there was a pile of 13 drums, which Mr. Lee said were not his. Some of the drums had open bungs and appeared to contain a dark oily substance. Mr. Lee speculated that they might have been left there by the boat refurbishers, and that some may contain asbestos. He also said that they have a problem with vandalism and with people leaving trash on the property. He said that the gates are all locked at night, but there is still a vandalism problem. Elsewhere in the yard, there were drums and piles of solid waste and metal forms scattered about.

Lee Fabricators
Inspection Report
August 19, 1993
Page 3

In the middle of the lot, near the water, there were some workers nailing boards onto dock structures. Mr. Lee said that they were making the docks, which use plastic floats that do not leach any contaminants into the water. He said that the floatation doesn't degrade like concrete or foam.

Ms. Turvey asked what other tenants are in the adjacent buildings. Mr. Lee said that there was a fly-by-night electroplating operation, a cleaning service, people working on boats, a sheet metal operation, an electrical contractor and a warehouse. Mr. Lee said that he saw the biggest potential environmental problems coming from the electroplators and the boat builders. He said that he suspected that the boat builders may be living on their boats, and he did not know what they were doing with their sewage. He also said that the site was formerly a coal gasification plant, and that there was a fuel line down the road that at one time had a major leak.

We thanked Mr. Lee for his time and he returned to the office. We then walked toward the water to look at and photograph the boat repair operation and the steel platforms. There was a concrete dock adjacent to the steel platforms, and the ramp leading to them was held up by a crane. When leaving the site, we observed and photographed rusted old oil tanks, apparently underground tanks that had been pulled, and a pile of drums stored on their sides. There was nothing to indicate the contents or ownership of the drums. We departed the site at 10:45

Joanne Polayes-Wien
Joanne Polayes-Wien, Inspector

DEPARTMENT OF ECOLOGY
INSPECTION REPORT

UBI #:	
FACILITY NAME: Lee Fabricators	
CONTACT: Darrell Lee	TELEPHONE: 373-5043
ADDRESS: 1723 Pennsylvania Ave., P.O. Box 4307	
CITY: Bremerton	COUNTY: Kitsap ZIP: 98312
TYPE OF FACILITY: Sand blast and metal fabrication	
RECEIVING WATER: Port Washington Narrows	
OTHER DISCHARGE:	
TREATMENT SYSTEMS:	
NPDES/STATE PERMIT NO:	
PERMIT EFFECTIVE DATE:	
PERMIT EXPIRATION DATE:	
HAZARDOUS WASTE GENERATOR No:	
SIS I.D. NUMBER:	
INSPECTOR: J. Polayes-Wien/M. Turvey	
DATE OF INSPECTION: May 5, 1994	
DATE OF REPORT: May 19, 1994	
PURPOSE OF INSPECTION: Sampling, follow-up	
TYPE OF INSPECTION: Announced	

NARRATIVE: This inspection was scheduled to take samples of the spent copper slag used for sand blasting. I called Darrell Lee a few days before our inspection and received permission to take samples. We arrived at the site at 10:30 a.m. and spoke with Mr. Lee. He said that he had taken a large sample of spent copper slag and sent it out to Sound Analytical to have a TCLP metals test run. He said that he had copper and a few other extra metals run. Mr. Lee said that he would have the test results on Friday or Monday and said that he would fax them to me.

Mr. Lee said that he has a potential buyer for the material to use it as fill if it is clean. He also said that he plans on building a barrier with steel plates (currently stored on the site) on the low side of the slag pile, using filter fabric at the base and tarps overhead and on the other side to contain the slag. He said that he plans on cleaning up the rest of the site where slag has spread. Mr. Lee said he is cleaning-up in stages, moving the slag inside the site to allow it to dry out before he has it taken away. In response to my question, Mr. Lee said that he hasn't yet moved any slag off site since I first inspected the property last summer.

While on the Penn Plaza Industrial Park property, I checked to see if there was any change in the condition of the drum pile near Thompson Avenue. I counted 13 drums and observed no change in their condition since my last inspection. We departed the site at 11:00 a.m.


Joanne Polayea-Wien, Inspector

DEPARTMENT OF ECOLOGY
INSPECTION REPORT

UBI #:	
FACILITY NAME: Penn Plaza Industrial Park	
CONTACT: Paul McConkey, Owner	TELEPHONE: 373-9288
ADDRESS: 1725 Pennaylvania Ave.	
CITY: Bremerton	COUNTY: Kitsap . ZIP: 98310
TYPE OF FACILITY: Induatrlal park	
RECEIVING WATER: Port Waashington Narrows	
OTHER DISCHARGE:	
TREATMENT SYSTEMS: none	
NPDES/STATE PERMIT NO:	
PERMIT EFFECTIVE DATE:	
PERMIT EXPIRATION DATE:	
HAZARDOUS WASTE GENERATOR No:	
SIS I.D. NUMBER:	
INSPECTOR: J. Polayea-Wien, R. Huey	
DATE OF INSPECTION: March 9, 1994	
DATE OF REPORT: March 15, 1994	
PURPOSE OF INSPECTION: Source control	
TYPE OF INSPECTION: Unannounced	

NARRATIVE: We arrived at the property at 1:40 p.m., and went to the Penn Plaza office to get permissaion to go on the aite. The office waa locked, and the entrancea to tenant offices (e.g. Lee Fabricatora) are located within the fenced area (which waa open), so we proceeded on the property.

We walked across the property to the drum pile by the fence along Thompaon Avenue. The 55-gallon drumma previoualy oboerved were still there. One of the drumma had liquid bubbling out around the edge of the lid, with hardened white material down the aide of the drum where it had overflowed.

On the remainder of the property, little appeared to have changed from my previous inapection. Along the water, the dock with the ramp auapended by a crane were atill there. One change I noted waa that the tarped enclosure for working on boata had been moved farther weat. Alao, the pile of empty drumma atacked on their aides on the northeast portion of the site had shrunk to about 10 to 15 drums.

There waa atill a significant accumulation of apent slag in the area of Lee Fabricatora aand-blast shed. In places, the slag waa well over one foot deep. We decided to request permission to sample the slag, returned to our car to get our sampling gear, and then proceeded to the Lee Fabricators office. In response to our request, an employee said that Mr. Lee waa on vacation thia week, and in Mr. Lee's abaeence the

Penn Plaza Industrial Park
Inspection Report
March 9, 1994
Page 2

employee said he could not either give or deny permission to take samples. The employee said that he preferred that we return when Mr. Lee is present, so we departed the site at about 2:10 without taking samples.

Joanne Polayea-Wien
Joanne Polayea-Wien, Inspector

Addendum: The overflowing drum was reported to ERTS and referred to Ecology Spill Response on March 13 1994.

DEPARTMENT OF ECOLOGY
ERT SYSTEM - INITIAL REPORT/FOLLOWUP

PAGE 1 OF 2

COORDINATOR: KAREN RENNAKER UNIQUE RECORD #: N15310 REGION: N

DATE/TIME REC'D: 03/15/94 10:00:00 REPORT TYPE: INITIAL

REPORTER'S NAME: JOANNE POLAYES-WIEN BUSINESS NAME:
3190 160TH AVE SE DEPARTMENT OF ECOLOGY
ADDRESS: BELLEVUE WA 98008-5452 BEST TIME
OR ANONYMOUS: TO CALL:

WORK PHONE: (206)-649-7233 EXT. HOME PHONE:

DETAILS ON INCIDENT:

COUNTY: KITSAP NEAREST CITY: BREMERTON
WATERWAY: WRIA #:
LOCATION:

WEATHER: UNKNOWN TIDE:

DETAILS ON ALLEGED VIOLATOR:

NAME & ADDRESS: CONTACT'S NAME:
PAUL MCKONKEY/PENN PLAZA INDUSTRIAL PARK HARVEY KORTMAN
1725 PENNSYLVANIA AVE PHONE NUMBER AND EXT:
BREMERTON WA 98310 (206)-373-9288

VEHICLE INFORMATION:

DESCRIPTION OF CONTAMINANT: (PROVIDED BY REPORTER)

MEDIUM: SOIL
MATERIAL: OIL/PETROLEUM OTHER: SUSPECTED OIL PRODU
QUANTITY: UNKNOWN
SOURCE: COMMERCIAL

COMMENTS: THE 1928 SANDBORNE FIRE INSURANCE MAP SHOWS THT A COAL
GASIFICATION PLANT WAS LOCATED ON THIS PROPERTY. IN ADDITION,
SEVERAL BUSINESSES LOCATED ON THE PROPERTY USE POOR HOUSEKEEPING
PRACTICES, SO THAT THE SITE IS LITTERED WITH DRUMS, SPENT SAND
BLAST GRIT (DEARSENIZED COPPER SLAG), OLD TANKS, MACHINE PARTS,
ETC.

REFERRED TO PROGRAM: TCP SECTION HEAD: GALLAGHER-I.I.

EXTERNAL REFERRAL? (Y/N): N

IF EXTERNAL, WHAT AGENCY:

INVESTIGATION COMPLETED? (Y/N): Y
IF YES, COMPLETE SECOND PAGE OF FORM.

CONTINUED ON PAGE 2



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave. S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000

May 12, 1994

CERTIFIED MAIL
P 311 404 076

Mr. Paul McConkey
Penn Plaza Industrial Park
1500 Thompson Drive
Bremerton, Washington 98310

Dear Mr. McConkey:

On December 16, 1993, and January 28, 1994, I sent you letters concerning potential violations of state water quality and dangerous waste regulations at your Penn Plaza Industrial Park property. Your initial written response was that you would take care of those items that were your responsibility, and you forwarded a copy of the letter to each of your tenants who was mentioned. Later, in a telephone message left for me on March 4, 1994, you denied personal responsibility for anything on the site, claiming you had little control over your tenants' actions. As the property owner, however, you are ultimately liable for contamination left behind on your property or pollution coming off your property.

The purpose of this letter is to gain action on your part as property owner to address the problem of abandoned drums on your site. I am referring to the drums located adjacent to the fence on the western property line (Thompson Avenue), just north of Lee Fabricators' sand-blast shed. I have counted thirteen 55-gallon drums in this unpaved, open area. The drums were not organized in any obvious fashion. Some drums were leaning or on their sides, some were dented and severely rusted, and several were open to the elements.

The drums have been stored at this location since at least July 15, 1993, the date of my first site inspection. The drums were either unlabeled as to their contents or the labels have deteriorated to the point of being unreadable. I observed that one drum was partially full with a dark oily substance visible through an open bung. Another drum was overflowing due to rainwater entering through an inadequately sealed lid and, on March 9, 1994, had liquid bubbling out around the edge of the lid, with hardened white material down the side of the drum. On May 5, 1994, I noticed a solvent odor in the area as well. I did not attempt to assess whether the remaining drums were empty or full due to safety concerns. In the absence of information documenting drums' contents, they are presumed to contain dangerous waste.

Mr. Paul McConkey
May 12, 1994
Page 3

To prevent formal enforcement, you must act promptly to remedy the violations listed above. Enclosed is a Hazardous Waste Generator Checklist summarizing regulatory requirements and a Hazardous Waste Services Directory to assist you in locating a company that will test and dispose of these wastes appropriately.

Please respond to this letter within two weeks (14 calendar days) of the date that you receive it. Your response should include a written plan of actions that will resolve each of the above violations, including a schedule for the timely completion of all actions. Failure to respond will lead to the initiation of formal enforcement. If you have any questions, please call me at (206) 649-7233.

Sincerely,



Joanne Polayes-Wien
Inspector

Enclosures

cc: Mac Davis, Department of Labor and Industries
Bremerton Fire Marshal



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000

September 22, 1994

CERTIFIED MAIL

Mr. Darrell Lee
Lee Fabricators
1723 Pennsylvania Ave.
Bremerton, WA 98310

Dear Mr. Lee:

Re: EARLY NOTICE LETTER #N-18-5030-000
Penn Plaza Industrial Park
1725 Pennsylvania Ave., Bremerton, WA

I am writing to send you information the Department of Ecology has gathered regarding the above referenced property. As part of the process under the Model Toxics Control Act (Chapter 70.105D RCW), Ecology maintains a database of known or suspected contaminated sites. Based on available information, we have added this property to our database as a site suspected to be contaminated by hazardous substances.

Enclosed is a computer print-out summarizing information which we believe reflects the current status of this site. A legend has also been enclosed to help you interpret codes used in this report.

Please note that inclusion in the database does not mean that Ecology has determined you are a potentially liable person under the Model Toxics Control Act (MTCA).

If a cleanup action does not occur on this property, Ecology will conduct a more detailed inspection at a future time, that may include testing for contamination. After that, Ecology will be better able to assess what action will be needed and to establish a priority for this work under the formal MTCA cleanup process. At that time, the potentially liable person(s) would be determined and would be responsible for cleanup costs, including state oversight.

Mr. Darrell Lee
Page 2
September 23, 1994

It is Ecology's policy to work cooperatively with persons to accomplish prompt and effective site cleanups. Cooperating with the department in planning or conducting a remedial cleanup action is not admission of guilt or liability.

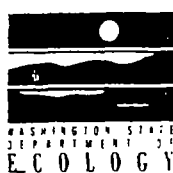
If you have any questions regarding this letter or if you would like a copy of Chapter 70.1050 RCW (The Model Toxics Control Act) and the implementing regulations, Chapter 173-340 WAC, which detail these requirements please contact Joanne Polayes-Wien at (206) 649-7233 or Louise Bardy at (206) 649-7209. Thank you in advance for your cooperation.

Sincerely,


Louise Bardy
Toxics Cleanup Program

LB:lb
Enclosures

cc: Paul McConkey, Penn Plaza Industrial Park
Andy Anderson, CB Concrete Products
Robert McConkey, Pier 44 Construction



WASHINGTON STATE
DEPARTMENT OF ECOLOGY

Attn: DW Notifications
M/S PV-11
Olympia, WA 98504-8711
(206) 459-6387

W: P	FEB 14 1992
RCV'D	
LOG	FEB 14 1992
REVIEW	FEB 19 1992 NWRD
G/WAC	

FORM 2

NOTIFICATION OF DANGEROUS WASTE ACTIVITIES

1. ☒ A. FIRST NOTIFICATION
(No previous application has been made for this site)
- ☐ B. REVISED NOTIFICATION DATE _____
(Enter existing site I.D. No. in Part 1F. List sections you revised.)
- ☐ C. WITHDRAW SITE I.D. NO. DATE _____
(Complete Sections 1F, 2B & 13. Enter existing I.D. No. in Part 1F.)
- ☐ D. REACTIVATE SITE I.D. NO. _____
(Complete all sections of the form. Enter previously assigned I.D. No. in Part 1F.)
- ☐ E. CANCEL SITE I.D. NO. DATE _____
(Site closed—no longer own or conduct business at this site. Complete Sections 1F, 2B & 13. Enter existing I.D. No. in 1F.)
- ☐ F. EXISTING I.D. NO. _____
(Complete for items 1B, C, D & E only) WA 198185011961

2.A. WASHINGTON STATE DEPARTMENT OF REVENUE REGISTRATION (TAX) NUMBER												2.B. SIC CODE(S)											
												PRIMARY				SECONDARY				OTHER			
6 0 0 - 5 8 5 - 2 6 4												3 4 4 1				3 4 7 9							
2.C. TYPE OF BUSINESS CONDUCTED AT THIS SITE WELDING/STEEL FABRICATION																							
3. NAME OF INSTALLATION																							
L E E F A B R I C A T O R S , I N C .																							
4. LOCATION OF INSTALLATION																							
Street																							
1 7 2 5 P E N N S Y L V A N I A A V E N U E N O .																							
County Name K I T S A P																							
City or Town												State				ZIP Code							
B R I E M E R T O N												W A				9 8 3 1 0 -							
5. INSTALLATION MAILING ADDRESS																							
Street or P.O. Box																							
P . O . B O X 4 3 0 7																							
City or Town												State				ZIP Code							
B R I E M E R T O N												W A				9 8 3 1 2 - 0 3 0 7							
6.A. INSTALLATION CONTACT																							
Name (last)												(first)											
L E E												D A R R E L L											
Job Title												Phone Number											
P R E S I D E N T												2 0 6 - 3 7 3 - 5 0 4 3											
6.B. INSTALLATION CONTACT MAILING ADDRESS (see instructions)												BOX 1 <input checked="" type="checkbox"/>				BOX 2 <input checked="" type="checkbox"/>							
Street or P.O. Box																							
City or Town																							
State																							
ZIP Code																							
7.A. NAME OF INSTALLATION'S LEGAL OWNER																							
L E E F A B R I C A T O R S , I N C .																							
Street, P.O. Box, or Route Number																							
P . O . B O X 4 3 0 7																							
City or Town												State				ZIP Code							
B R I E M E R T O N												W A				9 8 3 1 2 -							
7.B. PROPERTY OWNERSHIP (Provide address in section 12 if different than 7A.)																							
P A U L M C C O N K E Y																							
7.C. OWNER TYPE												7.D. PROPERTY TYPE											
<input type="checkbox"/> P												<input type="checkbox"/> R											

BB. ERA I.D. NO. _____

3.A. HAZARDOUS WASTE ACTIVITIES (See instructions for definitions of these activities).

9.B. USED-OIL FUEL ACTIVITIES.

3.C. DANGEROUS WASTE OR OFF-SPECIFICATION USED-OIL FUEL BURNING: TYPE OF COMBUSTION DEVICE.

(see instructions for definitions of combustion devices) 1. Utility Boiler 2. Industrial Boiler 3. Industrial Furnace.

10. **WASTE IDENTIFICATION** (Copy this page if you have more than 5 waste streams—other information (sections 9 and 11-13) not needed on continuation sheets)

A N U M B E R	S	DESCRIPTION OF WASTE(S)	D.		ESTIMATED OR ACTUAL ANNUAL WASTE QUANTITY	P
			DANGEROUS WASTE NUMBER	WASTE CODE		
		PAINT & RELATED MATERIAL INCLUDING THINNER	D 00 1 D 00 8		800	P
			D 00 7 D 0 3 5			
			F 00 3 W T O 1			
			F 00 5			

1. Complete a, b, or c; AND d below.

11.A. ☒ (Batch Frequency 90 DAYS) 2 00 P 0.00 PER MONTH

11.B. ☐ PER MONTH


11.C. ☐ ONE-TIME-ONLY 0.00 P 0.00

11.D. AMOUNT TO BE ACCUMULATED ON-SITE PRIOR TO SHIPMENT 2 00 P 0.00

12. COMMENTS
7 a. - 530 5th Street, Bremerton, WA 98310 (206) 377-4457
NOTE: We will have a one time only accumulation of 4,000 lbs. to dispose of. After that, weight will be as stated on front of form. This accumulation is disposal of old paints and thinners that are out of shelf life.

13. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE 	NAME AND OFFICIAL TITLE (type or print) PRESIDENT	DATE SIGNED 2/6/92
--	--	-----------------------

APPENDIX D

WDOE File Information: Penn Plaza

PENN PLAZA INDUSTRIAL PARK
1725 Pennsylvania Ave. Bremerton, WA 98310
T24N RIE sec 14

BACKGROUND

The current land owner of Penn Plaza Industrial Park is Mr. Paul McConkey. Portions of the land have been leased to a variety of tenants over the years. The principal tenants of the park include:

- Lee Fabricators - A metal fabrication shop.
- C.B. Concrete Products - Manufactures formed concrete products.
- Ablitt Metal - A metal fabrication shop.
- Pier 44 Construction - Facility containing steel forms, concrete materials, styrofoam, and other construction material.

Other industries and offices that have been or are currently associated with the industrial park include:

- CLM Pet Supply - A pet supply outlet (current tenant)
- American Marine Industries - Storage of Marine boats and equipment (current tenant)
- Fairall Pressure Washing - For vehicle, boat, and equipment washing (former tenant)
- Steve Gadd - Unknown business (former tenant)
- A Discount Sign - Sign drafting (unknown if current tenant)
- Star Co. - Unknown business (unknown if current tenant)
- Pacific Coast Hempoil - Unknown business (unknown if current tenant)

Prior to these industries and businesses, all or a portion of the Park was the site of a coal gasification plant. Consequently the property is being considered for investigation under Washington's Model Toxics Control Act (MTCA).

An adjacent property, known as Sesko Company, is located between the Penn Plaza park and the waters of Port Washington Narrows. This property was also a part of the former coal gasification plant. It is currently being used as a "Junk yard" for scrap metal, old fuel tanks, vehicles, boats, and other miscellaneous material. This site is also on the Washington Department of Ecology Hazardous Sites List.

In the summer of 1993, Washington Department of Ecology inspected the Penn Plaza Industrial Park and adjacent properties. The inspection report focused on piles of 55 gallon drums (many without adequate labels or containment) were at various locations around the Park. In addition, concrete dusts and washouts from trucks and equipment were discharged to the ground and apparently into the storm water drain which flows into Port Washington Narrows. Followup inspections by Ecology on March 9, 1994 and May 5, 1994 revealed that not much had changed. The drums were still around and other safety issues were not addressed. This prompted a letter to the land owner on May 12, 1994 concerning potential violations of state water quality and dangerous waste regulations.



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office, 5190 - 160th Ave. S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000

May 12, 1994

CERTIFIED MAIL
P 311 404 076

Mr. Paul McConkey
Penn Plaza Industrial Park
1500 Thompson Drive
Bremerton, Washington 98310

Dear Mr. McConkey:

On December 16, 1993, and January 28, 1994, I sent you letters concerning potential violations of state water quality and dangerous waste regulations at your Penn Plaza Industrial Park property. Your initial written response was that you would take care of those items that were your responsibility, and you forwarded a copy of the letter to each of your tenants who was mentioned. Later, in a telephone message left for me on March 4, 1994, you denied personal responsibility for anything on the site, claiming you had little control over your tenants' actions. As the property owner, however, you are ultimately liable for contamination left behind on your property or pollution coming off your property.

The purpose of this letter is to gain action on your part as property owner to address the problem of abandoned drums on your site. I am referring to the drums located adjacent to the fence on the western property line (Thompson Avenue), just north of Lee Fabricators' sand-blast shed. I have counted thirteen 55-gallon drums in this unpaved, open area. The drums were not organized in any obvious fashion. Some drums were leaning or on their sides, some were dented and severely rusted, and several were open to the elements.

The drums have been stored at this location since at least July 15, 1993, the date of my first site inspection. The drums were either unlabeled as to their contents or the labels have deteriorated to the point of being unreadable. I observed that one drum was partially full with a dark oily substance visible through an open bung. Another drum was overflowing due to rainwater entering through an inadequately sealed lid and, on March 9, 1994, had liquid bubbling out around the edge of the lid, with hardened white material down the side of the drum. On May 5, 1994, I noticed a solvent odor in the area as well. I did not attempt to assess whether the remaining drums were empty or full due to safety concerns. In the absence of information documenting drums' contents, they are presumed to contain dangerous waste.

DEPARTMENT OF ECOLOGY - TOXICS CLEANUP PROGRAM
SITE DATA SUMMARY

Apr 11, 1995

SITE ID INFORMATION:

TCP ID: N-18-5030-000

SITE NAME: Penn Plaza Industrial Park

SITE LOCATION INFORMATION:

COUNTY:

18 Kitsap

ADDRESS:

1725 Pennsylvania Ave.

CLOSEST CITY:

Bremerton

ZIP CODE:

98310

LONGITUDE:

LATITUDE:

DEGREES MINUTES SECONDS METHOD

TOWNSHIP RANGE SECTION

24N 1E 14

TAX PARCEL #

LEGISLATIVE DISTRICT 28

CONGRESSIONAL DISTRICT: 8

SITE STATUS INFORMATION:

RESPONSIBLE UNIT: N NORTHWEST

SITE MANAGER: NORTHWEST REGION

DATE ENTERED: Sep 22, 1994

LAST UPDATE DATE

ECOLOGY STATUS: 1

INDEPENDENT STATUS:

WARM RANK:

NFA CODE:

STATUTE: 2

PROGRAM PLAN:

UBAT SITE: X

EPA ID

PRELIMINARY ASSESSMENT RATING

SITE INSPECTION RATING:

ERTS ID: N14321

LUST ID:

UBI ID:

APRS PROJECT CODE:

SITE COMMENTS:

Potential site contamination from former coal gasification plant. Currently, unlabeled/uncontained drums, spent sand blast grit, old tanks &

AFFECTED MEDIA & CONTAMINANTS INFO:

MEDIA	STATUS	#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	#13	#14	#15	#16	#17	DW TYPE
1 Groundwater	S							S				S							
4 Soil	S							S				S							

Mr. Paul McConkey
May 12, 1994
Page 2

Continued storage of these waste materials on your property constitutes a violation of the following regulations:

1. Dangerous Waste Regulations WAC 173-303-070(1): *This section states that any person who generates a solid waste must determine whether or not his waste is designated as a dangerous waste.*
2. Dangerous Waste Regulations WAC 173-303-200 and 201: *These sections stipulate that a generator may accumulate dangerous waste on site without a permit for 180 days or less depending on the quantity.*
3. Dangerous Waste Regulations WAC 173-303-200(1)(b) and by reference -630(5)(a): *This section states that a containers holding dangerous waste must be in good condition and be kept closed. Some of the drums were not empty, and were open and deteriorating.*
4. Dangerous Waste Regulations WAC 173-303-200(1)(b)(d) and by reference -630(3): *Containers of dangerous waste must be labeled with the words "Hazardous Waste" or "Dangerous Waste" and identified as to the major risk(s) associated with the contents. None of the drums in question had legible labels. They must be labeled appropriately. Drums that contain waste that does not designate as dangerous should still be labeled as to content.*
5. Dangerous Waste Regulations WAC 173-303-200(1)(c): *Accumulation start dates must be marked clearly and visibly on each dangerous waste container. None of the drums had accumulation dates.*
6. Water Pollution Control Law, RCW 90.48.080: *This law states that no person shall allow any pollution to discharge, spill or seep into waters of the state. Pollution as defined under RCW 90.48.020 means any contamination or alteration of the chemical, physical or biological properties of any water of the state. Waters of the state include groundwater as well as surface water. In accordance with this law, materials including hazardous wastes must be stored so as to prevent polluting releases. These requirements can be met by storing drums within a secondary containment area, such as a berrued impervious pad under a roof or overhang to keep out rainwater. Alternatively, drums may be stored in a building, provided all fire regulations are met.*

The preceding violations are subject to formal enforcement action by the Department of Ecology. Enforcement may include the issuance of administrative penalties of up to \$10,000 per violation per day, in accordance with the Washington State Hazardous Waste Management Act, Chapter 70.105 RCW, and the Water Pollution Control Law, Chapter 90.48 RCW.

Mr. Paul McConkey
May 12, 1994
Page 3

To prevent formal enforcement, you must act promptly to remedy the violations listed above. Enclosed is a Hazardous Waste Generator Checklist summarizing regulatory requirements and a Hazardous Waste Services Directory to assist you in locating a company that will test and dispose of these wastes appropriately.

Please respond to this letter within two weeks (14 calendar days) of the date that you receive it. Your response should include a written plan of actions that will resolve each of the above violations, including a schedule for the timely completion of all actions. Failure to respond will lead to the initiation of formal enforcement. If you have any questions, please call me at (206) 649-7233.

Sincerely,



Joanne Polayes-Wien
Inspector

Enclosures

cc: Mac Davis, Department of Labor and Industries
Bremerton Fire Marshal

PENN PLAZA INDUSTRIAL PARK
CURRENT TENANTS
JANUARY 10, 1994

✓ LEE FABRICATORS
PO BOX 4307
BREMERTON WA 98312

✓ ABLITT METAL
1725 PENNSYLVANIA
BREMERTON WA 98310

✓ C.B. CONCRETE PRODUCTS, INC.
1540 THOMPSON DRIVE
BREMERTON WA 98310

~~STEVE GADD~~
~~PO BOX 1055~~
~~EDMONDS WA 98020~~

A DISCOUNT SIGN
1413 HENRY
BREMERTON WA 98310

2LM Pet Supply

~~JOHN FAIRALL~~
~~FAIRALL PRESSURE WASHING~~
~~398 A SYLVAN WAY~~
~~BREMERTON WA 98310~~

AMERICAN MARINE INDUSTRIES
1343 LOWER MARINE DRIVE
BREMERTON WA 98312

✓ PIER 44 CONSTRUCTION
1544 THOMPSON DRIVE
BREMERTON WA 98310

PACIFIC COAST HEMFOIL
PO BOX 1055
EDMONDS WA 98020
ATTN: BILL DEMOSS

STAR CO.
AL PAULUS
1134 NATIONAL AVENUE
BREMERTON WA 98310

RECEIVED

JAN 13 1994

DEPT. OF ECOLOGY

Penn Plaza Industrial Park
1500 Thompson Drive
Bremerton, Wa. 98310

January 11, 1994

M/S Joanne Polayes-Wien
Dept. of Ecology
3190 160th Ave. S.E.
Bellevue, Wa. 98008-5452

Dear M/S Paolayes-Wien:

I am the owner of Penn Plaza Industrial Park and am in receipt of your recent letter about potential hazards on our property.

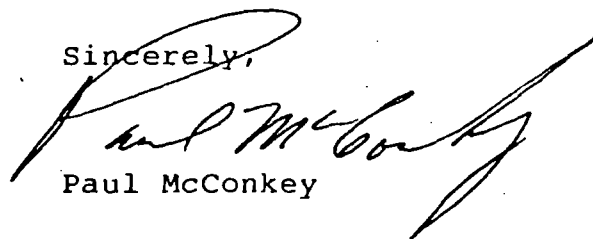
I have enclosed a list of major tenants on the property. I have also included a copy of the letters I have addressed to those mentioned in your report.

There are some problems which are my responsibility which I will address. I am temporarily without a manager, but will implement changes as soon as practicable when I have a new manager.

The references to waterfront operations with a crane or dock are responsibilities of another owner. His name is Bill Sesko and he lives in Bremerton.

Please let me know if I can be of further assistance.

Sincerely,



Paul McConkey

RECEIVED

JUN 13 1994

DEPT. OF ECOLOGY

Paul McConkey
Penn Plaza Industrial Park
1500 Thompson Drive
Bremerton, Wa. 98310

May 22, 1994

M/S Joanne Polayes-Wien
Department of Ecology
3190 160th Ave. S.E.
Bellevue, Washington 98008-5452

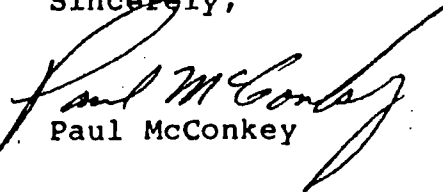
Dear Joanne:

I am applying for an EPA identification number, have numbered the drums you referred to in your letter of May 12th, and have delivered samples from each to a testing lab for analysis.

I will be out of town for two weeks, but have told Sol-Pro Inc. to expedite the disposal when they have determined the contents. At this point I can not determine the exact date of disposal, because it will depend on Sol-Pro.

If you need verification, please call Trace of Sol-Pro at 627-4822. As always I can be reached at 377-4457 in two weeks.

Sincerely,


Paul McConkey

WORKSHEET 1
SUMMARY SCORE SHEET

Site Name: Old Bremerton Gasworks (Formerly Penn Plaza and Sesko properties)

Site Location: (City, County, or Section/Township/Range)

Bremerton, Kitsap County, Section 14, Township 24 North, Range 1 East

Site Description: (Include management areas, compounds of concern, and quantities)

The Old Bremenon Gasworks operated during the 1920s as a coal gasification plant. Currently, the Gasworks encompasses the Penn Plaza Industrial park and the adjacent Sesko property. The current land owner of Penn Plaza Industrial Park is Mr. Paul McConkey. Portions of the land have been leased to a variety of tenants over the years. The Sesko Company is located between the Penn Plaza Park and the waters of Port Washington Narrows. It is currently being used as a "Junk yard" for scrap metal, old fuel tanks, vehicles, boats, and other miscellaneous material.

Environmental samples of surface soils and sediments were taken from the Sesko property in ^(M) March 1995 and analyzed for semi-volatile organics. Results from these samples indicate exceedances of MTCA Method A cleanup levels for many carcinogenic PAHs for industrial soils ~~and marine sediments~~. PAHs exceeding the Method A cleanup levels that are scored include: benzo(a)pyrene (1,810 mg/kg), benzo(b)fluoranthene (2,720 mg/kg), naphthalene (6,700 mg/kg), and phenanthrene (24,400 mg/kg). ~~PAHs were also detected in adjacent marine sediments.~~ ^(approximately 1000 ft away)

Except for an area of approximately 20 feet by 60 feet, the entire Penn Plaza site is paved with concrete. Chemical releases are likely to enter the storm drain system and enter the Port Washington Narrows. Chemical releases are assumed to have migrated into the groundwater prior to the pavement of the site. Releases to the air continue to occur as evidenced from the typical PAH odor mentioned by the Ecology inspector, Norm Peck. Thus, hazardous substance pathways are considered via groundwater, surface water, and air. Because the site is predominantly paved, only the unpaved portion was used for estimating quantities of contamination. However, the extent of contamination remains a major uncertainty for this site. ~~and assessing~~

~~any interest in the site~~

Special Considerations: (Include limitations in site file data, data which cannot be accommodated in the model, but which are important in evaluating the risk associated with the site)

This site hazard assessment was begun for Penn Plaza. After receiving recent sampling results from the adjacent Sesko property, the assessment was extended to the entire property formerly ^{called} the Old Bremerton Gasworks. Other property owners may be identified later.

Soils and sediments were ^{and metals} sampled from this site by the Department of Ecology in March 1995. The samples were analyzed for semi-volatile compounds. For the purposes of scoring, only the contaminated soils were used. The area of contamination is ^{in various areas} suspected to be throughout the properties. However, only the visibly stained soils observed during the site visit were used to estimate the extent of contamination (quantity). The Old Bremerton Gasworks may, in fact, represent a much larger area.

Therefore, ~~the~~ scoring may ~~underestimate~~ underestimate site risks.

ROUTE SCORES:

Ground Water/Human:

60.3

Overall Rank: _____

Surface Water/Human:

32.4

Air/Human:

23.9

Air/Environmental:

16.0

Per WARM, no toxicity data available, therefore air/environmental route not scored

Surface Water/Environmental:

43.5

WARM QA REVIEW

Site Name: OLD BREMERTON GASWORKS (Penn Plaza + SESKO)

QA Reviewer: TOM BELNICK, 233-9332

Date: 5-21-95

1. Surface Water Route ✓

(1.3) Check Quantity Value

2. Air Route ✓

(1.4) Check Final Tox/Mobility Value

(1.6) Check Quantity Value

3. Ground Water Route ✓

4. Miscellaneous Comments

- Add climate data to file -
- PGWK-1: Route Score - Don't score for AIR/Environmental Route -
- Good Summary of Site
- Check w/ Michael Spenser. Does Ecology want marine sed. route scored?
 - You would need TOC-normalized concentration to compare to Marine Sed. Quality Standards.

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

SITE HAZARD ASSESSMENT DATA COLLECTION SUMMARY SHEETS
FOR
WASHINGTON RANKING METHOD

SURFACE WATER, AIR AND GROUND WATER ROUTES ONLY

Site Name: Old Bremerton Gasworks/Penn Plaza Industrial Park

Location: 1725 Pennsylvania Ave., Bremerton, WA 98310

Site owner/operator: Mr. Paul McConkey

Address: 1500 Thompson Dr., Bremerton, WA 98310

Any other known PLP(s): Formerly Bremerton Gas Works

Address: unknown

Site Number: _____

Date(s) of field site hazard assessment: 5/9/95

Samples or field measurements: NA soil

NA surface water

NA air

NA ground water

(Attach copies of pertinent sampling and analytical data, as well as all other supporting documentation.)

Photographs: 7

Weather: Clear, partly cloudy

Lead inspector: Jim Eldridge

Other inspectors: none

Signature: _____

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

SITE HAZARD ASSESSMENT DATA COLLECTION SUMMARY SHEETS
FOR
WASHINGTON RANKING METHOD

SURFACE WATER, AIR AND GROUND WATER ROUTES ONLY

Site Name: _____ Penn Plaza Industrial Park _____
Location: _____ 1725 Pennsylvania Ave., Bremerton, WA 98310 _____
Site owner/operator: _____ Mr. Paul McConkey _____
Address: _____ 1500 Thompson Dr., Bremerton, WA 98310 _____
Any other known PLP(s): _____ Formerly Bremerton Gas Works _____
Address: _____ unknown _____
Site Number: _____
Date(s) of field site hazard assessment: _____ 5/9/95 _____
Samples or field measurements: _____ NA _____ soil
_____ NA _____ surface water
_____ NA _____ air _____ NA _____ ground water
(Attach copies of pertinent sampling and analytical data, as
well as all other supporting documentation.)
Photographs: _____ 7 _____
Weather: _____ Clear, partly cloudy _____
Lead inspector: _____ Jim Eldridge _____
Other inspectors: _____ none _____
Signature: _____

PART I: Hazardous Substances

NOTE: Page numbers by "route" (e.g. SW-2, A-13) shown in parentheses throughout this checklist refer to the WARM Scoring Manual. WK- numbers refer to pages of the new scoring sheets (not those in the scoring manual). These are presented in Appendix D.

A. Hazardous substances

List specific hazardous substances, known or suspected (check k or s), currently, or that have been previously (check c or p), at the site property (WK-2,3). Give an estimate, if available, of the quantity (not concentration) of each:

<u>Hazardous Substance</u>	<u>K</u>	<u>S</u>	<u>C</u>	<u>P</u>	<u>Quantity</u>	<u>Units</u>
1. PAHs _____	<u>K</u>				Unknown _____	_____
2. Naphthalene _____	<u>K</u>				Unknown _____	_____
3. Phenanthrene _____	<u>K</u>				Unknown _____	_____
4. Benzo(b) fluoranthene _____	<u>K</u>				Unknown _____	_____
5. Benzo(a) pyrene _____	<u>K</u>				Unknown _____	_____

Additional? no (list on attachment)

By which routes are these available? (WK-2,3)

<u>Number (from above)</u>	<u>Surface Water</u>	<u>Air</u>	<u>Groundwater</u>
1. Naphthalene _____	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>
2. Phenanthrene _____	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>
3. Benzo(a) pyrene _____	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>
4. Benzo(b) fluoranthene _____	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>

B. SOURCES

Check those known or observed (WK-3):

x _____ drums or other containers
_____ electrical transformers
_____ above ground tanks
_____ below ground tanks
x _____ ponds, pits, or other impoundments (former)
_____ pipelines (other than water, sewer, or gas)
_____ floor drains
x _____ exterior drains for rainwater, surface waters, spills, etc.
x _____ other? Identify: _____ stained soils _____

C. INDICATORS

Check those known or observed:

☒ discolored soils
☒ disturbed soils
☐ discolored standing water
☒ unusual or noxious odors PAH odor and petroleum
☐ sick or dead vegetation
☐ No groundwater monitoring wells
☐ other? Identify: _____

If any are checked in B or C, explain details including exact locations (identify location on a map or drawing).

Additional information: see sketch

PART II: Releases

A. KNOWN OR SUSPECTED RELEASES

List those hazardous substances identified (by number) in I.A. which are known, or suspected, to have been released (WK-2,3):

<u>Substance (#)</u>	<u>Quant. Released</u>	<u>Units</u>	<u>Medium Released to</u>
Naphthalene	Unknown _____	_____	soils & GW suspected
Phenanthrene	Unknown _____	_____	_____
Benzo(b)fluoranthene	Unknown _____	_____	_____
Benzo(a)pyrene	Unknown _____	_____	_____

B. SOURCES AND IMPACTS (Pages SW-5,6; A-9,10; GW-6,7)

List those hazardous substances identified (by number) in II.A. and identify the source and impact:

<u>Substance No.</u>	<u>Source</u>	<u>Impacts/Affects to</u>	<u>Area</u>
Naphthalene__	soil__	surface water	visible 20' x 60'
Phenanthrene__	_____	ground water	_____
Benzo(b)fluoranthene__	_____	air	_____
Benzo(a)pyrene	_____	_____	_____

Additional information/reference? 30' x 60' area visibly stained. Suspect much greater area under pavement.

III. Migration Potential

A. CONTAINMENT- - LANDFILLS

(SW-7; A-12; GW-8,9)

Present? N/A How many?

Check those that apply:

1. _____ An engineered, maintained run-on/run-off control system
2. _____ An engineered/maintained cover without ponding
3. _____ Unmaintained run-on/runoff control system or cover
4. _____ No run-on/runoff control or no cover
5. _____ Uncontaminated soil cover greater than 6" thick
6. _____ Uncontaminated soil cover less than 6" thick
7. _____ Contaminated soil used as cover
8. _____ A functioning vapor collection system
9. _____ Mixing or agitation used
10. _____ No liner
11. _____ Single clay or compacted soil liner
(permeability _____ cm/sec)
12. _____ Single synthetic liner (permeability _____ cm/sec)
13. _____ Double liner system (permeability _____ cm/sec)
14. _____ Leachate collection system, maintained and functioning
15. _____ Leachate collection system, unknown condition or not functioning
16. _____ Liquid wastes may have been disposed of
17. _____ Liquid wastes were disposed of in landfill
18. _____ Reliable evidence no liquid wastes were disposed

Additional
comments:

(SW-7, 8; A-13;
GW-10, 11)

Check those that apply:

- Additional
comments:

C. CONTAINMENT--DRUMS AND SMALL CONTAINERS

(SW-9; A-11;
GW-11)

Present ___ Yes ___ How many? ___

CB Concrete Products utilize process paints and resins stored in 55 gal drums which are unrelated to contamination at Old Gas Works Parks

Check those that apply:

1. ☒ No functional containment
2. ☐ There is secondary containment capacity for the total volume of containers
3. ☐ There is secondary containment with capacity for at least 110% of volume of the largest container
4. ☐ The secondary containment is less than 110% of the volume of the largest container
5. ☐ The containers are stored in single, or double layers on pallets, or in racks
6. ☐ The containers are stored in an unstable manner
7. ☐ Some containers are open or have visible liquid
8. ☐ Some containers are leaking
9. ☐ Containers are protected from weather
10. ☐ Containers showing deterioration
11. ☐ Containment surface is impervious
12. ☐ Containment surface has cracks or semi-permeable
13. ☐ No base material/permeable base such as gravel/base materials unknown
13. ☐ Containment is regularly inspected and maintained
14. ☐ Evidence of containment failure

Additional comments: ___ The site was not scored on this basis because there is no evidence of releases of these. _____

(SW-9; A-11; GW-11)

NA

Check those that apply:

1. _____ Secondary containment with a capacity of 110% of the volume of the tanks
2. _____ Secondary containment at least 50% of the volume of all tanks
3. _____ Containment system with capacity for at least 10% of volume of containers or tanks
4. _____ No containment, or less than 10% capacity
5. _____ Tank volumes maintained
6. _____ Automatic controls used for volume maintenance
7. _____ Tanks are covered
8. _____ Uncovered tanks have aeration, mixing, or heating of tank contents
9. _____ Containers sealed, protected
10. _____ Containers sealed, not protected
11. _____ Containers deteriorated
12. _____ Containers leaking
13. Record the #s of above which apply only to above ground tank _____
14. Record the #s of above which apply only to below ground tanks _____
15. Record the #s of above which apply to both above and below ground tanks:

Additional
comments

E. CONTAINMENT--WASTE PILES (SW-10; A-13; Gw-12,13)

Present? NA How many?

Check those that apply:

1. _____ Waste pile is outside, no protecting structure
2. _____ Waste pile is outside, in open structure with roof
3. _____ Waste pile is outside, with partial or unmaintained cover
4. _____ Waste pile is outdoors, with maintained cover
5. _____ No cover is present
6. _____ Waste pile is fully enclosed, intact building
7. _____ There is an engineered run-on/run-off control
8. _____ The run-on/run-off is maintained
9. _____ Run-on/runoff control present, unknown condition
10. _____ No run-on/runoff control system present, or unknown if present
11. _____ Liner or base present; _____ Not present.
12. _____ Single clay or compacted soil liner
13. _____ Single synthetic liner
14. _____ Double liner
15. _____ Maintained, functioning leachate collection system
16. _____ Leachate collection system; _____ Unknown condition;
or _____ Not functioning.

Additional
comments

F. CONTAINMENT--SPILLS, DISCHARGES, AND CONTAMINATED SOIL
(SW-10,11; A-13,14; GW-13)

Check those that apply:

1. ☐ Spill, discharge, or contaminated soil only in the subsurface at the site--including dry wells, drain fields, leaking underground storage tanks
2. ☐ Soil contamination that has been covered partially excavated and filled with at least 6 inches of clean soil
3. ☐ Soil contamination that has been covered or partially excavated and filled with less than 6 inches of clean soil
4. ☐ Uncontaminated soil cover >2 feet thick
in some areas, concrete cover In other areas
5. ☒ No cover^; or ☐ Cover <2 feet, but > 6" thick
6. ☐ Spill, discharge, or contaminated soil present at the surface in an area with maintained run-on/run-off control
7. ☐ Spill, discharge, or contaminated soil present at the surface in an area with unmaintained run-on/run-off controls?
8. ☒ Spill, discharge, or contaminated soil present at the surface with no run-on/run-off control or unknown controls?
9. ☐ Contaminated soil has been disturbed or excavated and stored above grade
10. ☐ A functioning vapor recovery system
11. ☐ No vapor recovery system

Additional comments ☐ Extent of contamination beneath concrete is unknown.

G. CONTAINMENT--SITE CHARACTERISTICS
(SW-11,12; A-6; GW-14; WK-5,6,8)

1. How would you evaluate the site soils? Circle predominant textural class.

 x Sand, gravel, sandy gravel, well-graded sand, well-graded gravel, gravelly sand, gravelly sand loam, silty sandy loam?

 Poorly-graded sands with fines, silt-sand mixtures, loam, silt loam, sandy silt loam, clayey sand, clay sand loam?

 Clayey sands, sand-clay mixtures, clayey gravels, clay-sand-gravel mixtures, inorganic silts, clayey silt loam, silty clay loam, porous rock outcrop, sandy silty clay, sandy clay loam?

 Clay (organic and inorganic), clay loam, rock outcrop, peat, peaty clay?

Is the above based on personal observation, lab analysis, or professional judgement by a soil expert? (circle)

2. Total annual precipitation= 38.7 in./yr (SW-12; WK-5)

3. Max. 2-yr/24-hr precip.= 3-3.5 inches (SW-14; WK-5)

4. Net precipitation (see 2.2; GW-13)= 24.1 in. (WK-9)

5. Is the site not in a flood plain? No (SW-14; WK-5)
Is the site in a 500 year flood plain?
Is the site in a 100 year flood plain?

6. What is the terrain slope to the nearest surface water?
max 15% near contamination (SW-14,15; WK-6)

7. What is the subsurface hydraulic conductivity?
 10^{-1} 0^{-3} cm/sec (GW-14; WK-9) sand & gravel 10^{-2}

8. What is the vertical depth from the deepest point of known contamination to ground water? 15-20 feet
(GW-15; WK-9)

Additional comments: observed seep along bank during visit. 15-20' below top of bank.

IV. Targets

A. DISTANCE TO SURFACE WATER (SW-16; WK-6)

1. What surface water(s) (lake, stream, river, pond, bay, etc.) is/are within 10,000 feet (downgradient) of the site?

Name	Dist.-ft.	Obs.	Meas.
Port Washington Narrows	<500'	x	

None? _____ .Comments _____

2. What drinking water intakes are within 2 miles of the site? (all lake intakes, river intakes downstream only) (SW-12; WK-6)

None? None

Source	Location	Pop. Served

3. How much acreage (anywhere) is irrigated by surface water intakes (downstream only) or wells (anywhere) within 2 miles of the site? (SW-16; GW-18; WK-6,9)

None? _____

SURFACE WATER: Acres None downgradient (1600 acres max.)

Source(s) _____ WRIS _____;

GROUNDWATER: Acres 23 (4500 acres max.)

Source(s) _____ WRIS _____

4. What is the distance to the nearest fishery resource (total of overland distance plus downgradient distance)? (SW-17; WK-6)

Over 10,000 feet? _____ Distance if less than 10,000 feet? _____ <500 _____ ft.

5. What are the names of, and the distances to, the nearest sensitive environments (total of overland distances plus downgradient distances)? (SW-18; A-15; WK-6)

Over 10,000 feet? _____ Names and distances if less than 10,000 feet: _____ Port Washington Narrows Shore (adjacent)
_____ City Park (NE) 2000'
_____ Steven's Canyon Park 4060'

6. Is the aquifer a federally-designated sole source aquifer? No (GW-16; WK-9)

7. Is the ground water used for: (GW-16; WK-9)

_____ private supply
x _____ public supply
x _____ irrigation of human food crops or livestock
_____ non-food (human) vegetation
_____ not used due to natural contaminants
_____ ground water not used, but usable

8. Distance to nearest drinking water well? _____ ~ 3000 _____ feet (GW-17; WK-9)

9. Is there an alternate source available to groundwater for private or public water supply? (WK-9) Yes

10. Population served by drinking water wells within 2 miles? >30,000 (GW-17; WK-9)

11. Distance to the nearest population? 50 feet (A-15, 16; WK-8)

12. Population within one-half mile radius? 5200 (A-16; WK-8) Based on 500/school x 3 schools, +1500 high school + 200 hospital + 1500 residential, 500 commercial workers

Additional comments (e.g. potential for natural resource damage, or other ecological concerns): _____

TELECOPY TRANSMITTAL FROM:



An Employee-Owned Company

SCIENCE APPLICATIONS INTERNATIONAL CORPORATION

18706 North Creek Parkway, Suite 110
Bothell, WA 98011Date: May 16, 1995 # of Pages: 3

To: <u>Naney Winters</u>	From: <u>Jim Eldridge</u>
Of: <u>SAIC - Olympia</u>	Of: <u>SAIC, Bothell Office</u>
FAX #: <u>360-943-1331</u>	FAX #: <u>(206) 485-5566</u>
Phone #: <u>360-754-7077</u>	Phone #: <u>(206) 485-5800</u>

Here is the revised sketch. You can white out the other sketch. Also some revised text for your info.

9/24/97 - Dave Holmes comment.

EAI Note:

this & following pages are apparent revisions of a report prepared for Ecology by SAIC. The original report was not included in any of the files reviewed, but apparently supports the fact that Penn Plaza is not a CESAS site. Page 2 & any following pages were also not present in WDOE file.

No environmental samples have been taken on the Penn Plaza Industrial Park property and there are no historical analytical data.

SITE HAZARD ASSESSMENT ACTIVITY

On April 12, 1995, Ecology sent a notification letter to the land owner regarding a site hazard assessment under MTCA. Due to the lack of analytical data for this site, there was some question whether the Washington Ranking Method (WRM) for hazardous sites could be applied. In conversations with Mr. Norm Peck of Ecology's Northwest Regional Office, he had indicated the adjacent site (Sesko Co.) had been sampled in March 1995, and that the analytical data from this site could possibly be used for the Penn Plaza site. ^{Three samples in} ~~A few~~ soil and marine sediment samples were collected from ^{the} nearby property. Results from these samples indicate exceedances of MTCA Method A cleanup levels for carcinogenic PAHs for industrial soils and marine sediments.

Field Inspection

Two of the samples were collected from the soil areas and analyzed for PAHs. Another soil sample was analyzed for metals. The one sediment sample was analyzed for PAHs.

After repeated unsuccessful attempts to contact the land owner by phone, a drive by site inspection was performed by Mr. Jim Eldridge of SAIC on May 9, 1995. The purpose of the site inspection was to evaluate the suspected releases of hazardous substances at Penn Plaza Industrial Park (as noted from the previous inspections) and to identify conditions that would support an application of analytical data from the Sesko site to Penn Plaza.

Most of the 55-gallon drums are no longer present. The thirteen drums adjacent to the fence on the western property just north of Lee Fabricators' sand-blast shed were removed. The contents and whereabouts of the drums are unknown. Approximately 10 drums of unknown contents were associated with CB Concrete Products. These drums were labeled, in good condition, and appeared to be process-related. However, there was no spill containment structure for these drums which were located under an open shed on the north side of their facility.

Because the entire Penn Plaza site is paved with concrete, any hazardous substance release would not enter the subsoil or into the groundwater, except perhaps through cracks. Chemical releases are likely to enter the storm drain system and enter the Fort Washington Narrows. However, a major uncertainty for this site is whether any hazardous substance releases to the subsurface soil and groundwater may have occurred during operations of the former coal gasification plant. A potential contaminant pathway could occur if at least a portion the former plant was unpaved.

The attached sketch and photographs provide a general view of the activities existing at the site.

Conclusions

In the absence of site-specific data and unconfirmed releases of hazardous substances from the Penn Plaza Industrial Park, the ranking model cannot be used for this site. Based on the information in the Penn Plaza file, the issue was potential contamination from drums that may

NRIS - information for determining ~~acres used~~ water used for irrigation. w/in 2 mile radius of site.

Penn Plaza 24/1/14

Site Name _____ Downgradient _____ surface water use (acres) _____ g. water (acres) _____

San Renge Sec.			
IN RIE S15	0.5	2.0	
S14	none	→	
S13	none	→	
S12	2.0, 1.0		
S11	1.5,		
S10		15,	
S9	none	→	
S8	"6, 2, 2, 1.5"		
S4	NONE	→	
S3	14, 10, 7, 7		
S2	none	→	
S22	20		
S23	none	→	
S24	none	→	
S21		2.0	
S27		4.0	
S26	20		
S28	none	→	

TOTALS (Acres)

id numbers from surface water column,
id number from water column.

TOTAL

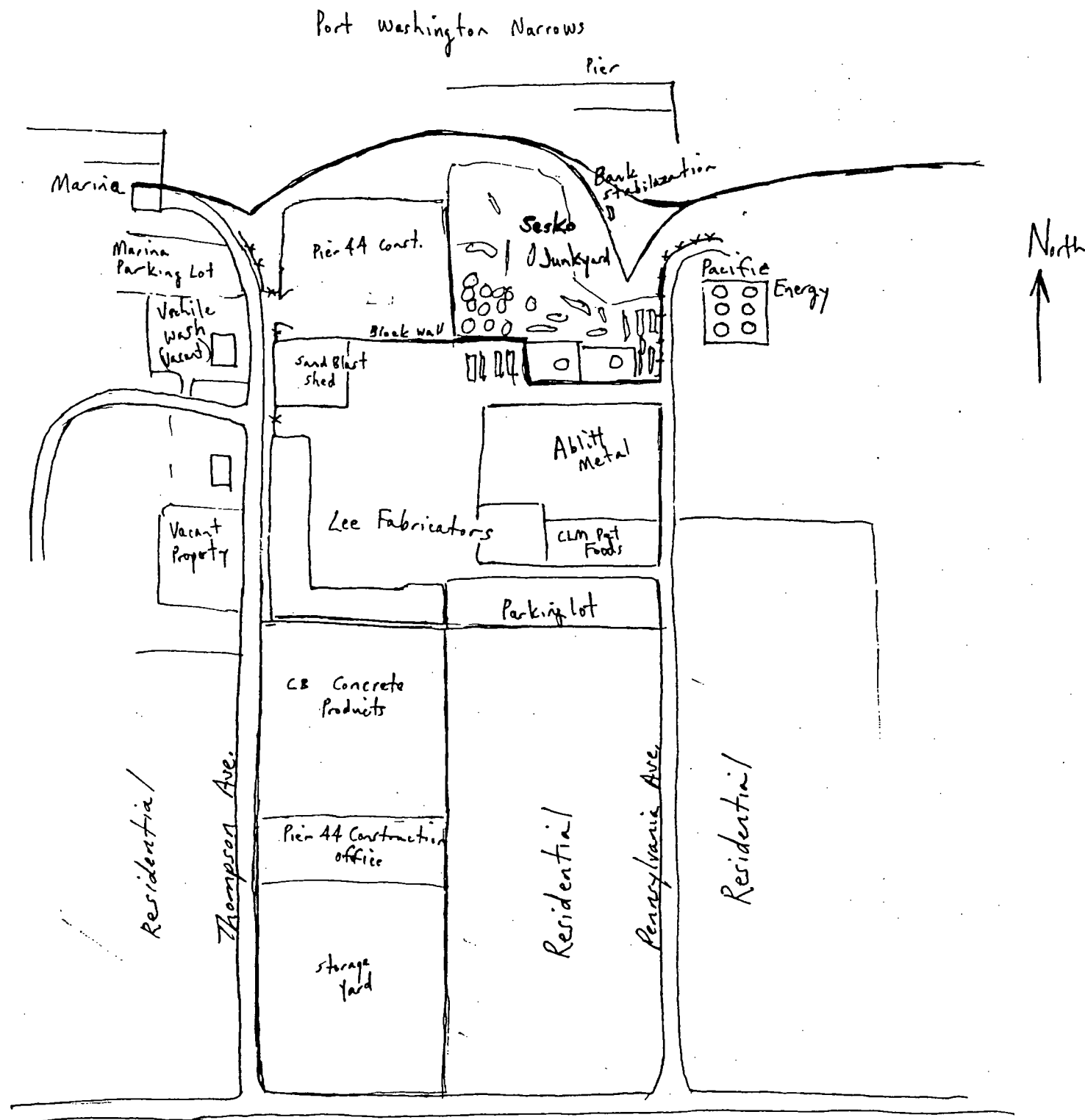
TOTAL

NOTES on using this information

User of information must determine if surface water irrigation info. is downgradient of site. if downgradient w/in 2 mile use info, ~~surface~~. if surface water irrigation info is upgradient of site do not use ~~Dickerson~~ Cr. info for surface water.

Chico Cr.

• Dickerson Cr



SKETCH OF
PENN PLAZA INDUSTRIAL PARK AREA
5/9/95

Bremerton Gas Works

Sample #5 BRMGAS 01

95138020

BRMGAS 03

95138022

BRMGAS 04

95138023

138020 (soil)

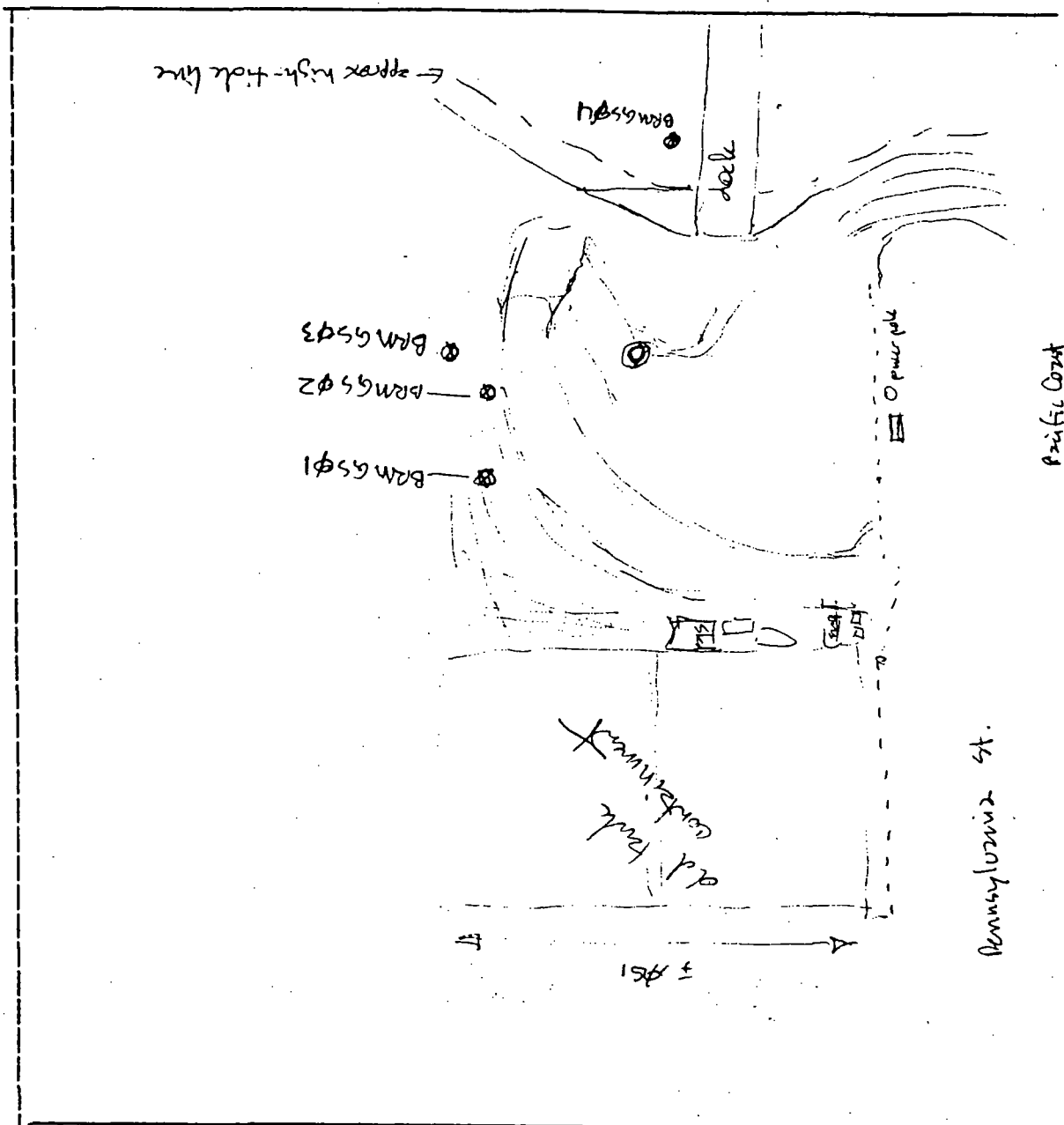
mg/kg
138022 (soil)

138023 (Sediment)

phthalene	6,700	14.1	15.7
methylnaphthalene	1,190	8.6	7.6
naphthalene	5,830	7.8	24.5
acenaphthene	545	0.3	15.3
benzofuran	355	1.7	1.7
fluorene	6,070	4.3	10.2
anthracene	24,400	100.0	102.0
benz[a]anthracene	9,740	26.0	43.8
benz[b]fluoranthene	100	1.2	1.2
benz[k]fluoranthene	12,500	81.0	122.0
pyrene	17,700	90.0	159.0
benzo(a)anthracene	3,740	15.8	45.2
benz[e]pyrene	4,160	23.6	52.1
benzo(b)fluoranthene	2,720	10.8	42.7
benzo(k)fluoranthene	734	4.3	16.1
benzo(a)pyrene	1,810	7.8	47.6
benzo(1,2,3-cd)pyrene	1,230	3.7	27.3
benzo(a,h)anthracene	262	1.1	5.7
benzo(ghi)perylene	1,420	3.9	35.1

Site Diagram

Site Name:



Site #

Site Location: N end Pennsylvania Ave, Bremerton

Approximate site dimensions: 150' x 400'

Date: 29 Mar 95

Time: 1115

Inspector: [Signature]



RECEIVED
APR 26 1995
DEPT. OF ECOLOGY

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
MANCHESTER ENVIRONMENTAL LABORATORY

7411 Beach Drive East • Port Orchard, Washington 98366-8204 • (360) 871-8860 • FAX (360) 871-8850

April 21, 1995

TO: Norm Peck, Project Officer
FROM: Myma McIntosh, Metals Chemist *m*
SUBJECT: Metals Quality Assurance memo for the Old Bremerton Gasworks Project
Sample Numbers: 95138021 -95138023

QUALITY ASSURANCE SUMMARY

Data quality for this project was good. Antimony and silver are qualified as estimates due to low recovery of LCS, spikes and precision problems. Arsenic was qualified with "N" because one spike recovery was slightly low.

SAMPLE INFORMATION

The samples from the Old Bremerton Gasworks project were received by the Manchester Laboratory on 3/29/95 in good condition.

HOLDING TIMES

All analyses were performed within the USEPA Contract Laboratory Program (CLP) holding times for metals analysis (28 days for mercury, 180 days for all other metals).

INSTRUMENT CALIBRATION

Instrument calibration was performed before each analytical run and checked by initial calibration verification standards and blanks. Continuing calibration standards and blanks were analyzed at a frequency of 10% during the run and again at the end of the analytical run. All initial and continuing calibration verification standards were within the relevant USEPA (CLP) control limits. AA calibration gave a correlation coefficient (r) of 0.995 or greater, also meeting CLP calibration requirements.

PROCEDURAL BLANKS

The procedural blanks associated with these samples show no analytically significant levels of analytes.

SPIKED SAMPLE ANALYSES

Spiked and duplicate spiked sample analyses were performed on this data set. All spike recoveries, with the exception of antimony, arsenic and silver are within the CLP acceptance limits of +/- 25%.

PRECISION DATA

The results of the spiked and duplicate spiked samples are used to evaluate precision on this sample set. The Relative Percent Difference (RPD) for all analytes, with the exception of silver is within the 20% CLP acceptance window for duplicate analysis.

LABORATORY CONTROL SAMPLE (LCS) ANALYSES

LCS analyses are within the windows established for each parameter, with the exception of antimony and silver. This is a limitation of the approved digestion method for sediments.

Please call Bill Kammin at SCAN 206-871-8801 to further discuss this project.

MMM:mmm

Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Mercury

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Project Officer: Norm Peck

Method: EPA245.5

Date Reported: 10-APR-95

Matrix: Sediment/Soil

Units: mg/Kg

Analyte: Mercury

Sample	QC	Field ID	Result	Qualifier	Received	Analyzed
95138021		BRMGAS02	0.028	P	03/29/95	04/07/95
95138021	Matrix Spike		102 %		03/29/95	04/07/95
95138021	Matrix Spike		100 %		03/29/95	04/07/95
95138022		BRMGAS03	0.022	P	03/29/95	04/07/95
27051112			106 %			04/07/95
BLN51113			0.005	U		04/07/95

Authorized By:

Randy S. King

Release Date:

4-11-95

Page: 1

Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Mercury

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Project Officer: Norm Peck
Date Reported: 18-APR-95

Method: EPA245.5
Matrix: Sediment/Soil
Analyte: Mercury

Sample	QC	Field ID	Result	Qualifier	Units	Received	Analyzed
95138023		BRMGAS04	0.0511		mg/Kg Dry Wt.	03/29/95	04/14/95
27051171		HGLCS1601	92 %				04/14/95
BLN51173		HGPB1601	0.005	U	mg/Kg Dry Wt.		04/14/95

Authorized By: M. McElroy

Release Date: 4/20/95

Page: 1

Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Arsenic

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Project Officer: Norm Peck

Method: EPA206.2

Date Reported: 04-APR-95

Matrix: Sediment/Soil

Units: mg/Kg

Analyte: Arsenic

Sample	QC	Field ID	Result	Qualifier	Received	Analyzed
95138021		BRMGAS02	19.5	N	03/29/95	04/03/95
95138022		BRMGAS03	4.66	N	03/29/95	04/03/95
95138023		BRMGAS04	4.47	N	03/29/95	04/03/95
95138023	Matrix Spike		80 %		03/29/95	04/03/95
95138023	Matrix Spike		71 %	N	03/29/95	04/03/95
BLN50970		ESPB1302	0.3	U		
ERA50971		LCS1302	108 %			

Authorized By: M. McLeod

Release Date: 4/5/95

Page: 1

Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Selenium

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Project Officer: Norm Peck

Method: EPA270.2

Date Reported: 05-APR-95

Matrix: Sediment/Soil

Units: mg/Kg

Analyte: Selenium

Sample	QC	Field ID	Result	Qualifier	Received	Analyzed
95138021		BRMGAS02	0.4	U	03/29/95	04/04/95
95138022		BRMGAS03	0.4	U	03/29/95	04/04/95
95138023		BRMGAS04	0.4	U	03/29/95	04/04/95
95138023	Matrix Spike		86 %		03/29/95	04/04/95
95138023	Matrix Spike		90 %		03/29/95	04/04/95
BLN50970		ESPB1302	0.4	U		
ERA50971		LCS1302	107 %			

Authorized By: M. M. Platos

Release Date: 4/6/95

Page: 1

Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Thallium

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Project Officer: Norm Peck

Method: EPA279.2

Date Reported: 06-APR-95

Matrix: Sediment/Soil

Units: mg/Kg

Analyte: Thallium

Sample	QC	Field ID	Result	Qualifier	Received	Analyzed
95138021		BRMGAS02	0.5	U	03/29/95	04/05/95
95138022		BRMGAS03	0.5	U	03/29/95	04/05/95
95138023		BRMGAS04	0.5	U	03/29/95	04/05/95
95138023	Matrix Spike		83 %		03/29/95	04/05/95
95138023	Matrix Spike		82 %		03/29/95	04/05/95
BLN50970		ESPB1302	0.5	U		
ERA50971		LCS1302	93 %			

Authorized By: m. mclachlan

Release Date: 4/7/95

Page: 1

Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Inductively Coupled Plasma

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: BLN51016

Blank ID: ESPB1302

Project Officer: Norm Peck

Date Prepared: 03/31/95

Date Analyzed:

Method: EPA200.7

Matrix: Sediment/Soil

Units: mg/Kg

Analyte	Result	Qualifier
Antimony	3	U
Beryllium	0.1	U
Cadmium	0.3	U
Chromium	0.5	U
Copper	1	U
Lead	2	U
Nickel	1	U
Silver	0.3	U
Zinc	0.41	P

Authorized By: 

Release Date: 4/6/95

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Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Inductively Coupled Plasma

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: LCS51017

Blank ID: LCS1302

Project Officer: Norm Peck

Date Prepared: 03/31/95

Date Analyzed:

Method: EPA200.7

Matrix: Sediment/Soil

Units: mg/Kg

Analyte	Result	Qualifier
Antimony	11	%
Beryllium	95	%
Cadmium	96	%
Chromium	85	%
Copper	91	%
Lead	87	%
Nickel	93	%
Silver	15	%
Zinc	89	%

Authorized By: 

Release Date: 4/6/95

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Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Inductively Coupled Plasma

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: 95138021

Date Received: 03/29/95

Method: EPA200.7

Field ID: BRMGAS02

Date Prepared: 03/31/95

Matrix: Sediment/Soil

Project Officer: Norm Peck

Date Analyzed: 04/04/95

Units: mg/Kg

Analyte	Result	Qualifier
Antimony	3	UJ
Beryllium	0.37	P
Cadmium	0.34	P
Chromium	23.8	
Copper	16.1	
Lead	17	P
Nickel	27.6	
Silver	0.3	UJ
Zinc	36.9	

Authorized By: 

Release Date: 4/6/95

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Manchester Environmental Laboratory

Department of Ecology

Analysis Report for Inductively Coupled Plasma

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: 95138022

Date Received: 03/29/95

Method: EPA200.7

Field ID: BRMGAS03

Date Prepared: 03/31/95

Matrix: Sediment/Soil

Project Officer: Norm Peck

Date Analyzed: 04/04/95

Units: mg/Kg

Analyte	Result	Qualifier
Antimony	3	UJ
Beryllium	0.31	P
Cadmium	0.32	P
Chromium	13.2	
Copper	43.8	
Lead	39	
Nickel	101	
Silver	0.3	UJ
Zinc	91.1	

Authorized By: 

Release Date: 4/6/95

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Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Inductively Coupled Plasma

Project Name: Old Bremerton Gasworks

LEIS Project ID: 1722-95

Sample: 95138023

Date Received: 03/29/95

Method: EPA200.7

Field ID: BRMGAS04

Date Prepared: 03/31/95

Matrix: Sediment/Soil

Project Officer: Norm Peck

Date Analyzed: 04/04/95

Units: mg/Kg

Analyte	Result	Qualifier
Antimony	3	UJ
Beryllium	0.27	P
Cadmium	0.3	U
Chromium	21.4	
Copper	40.1	
Lead	24.4	
Nickel	34.6	
Silver	0.3	UJ
Zinc	81.2	

Authorized By: 

Release Date: 4/6/95

Page:

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Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Inductively Coupled Plasma

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: 95138023 (Matrix Spike - LMX1) Date Received: 03/29/95

Method: EPA200.7

Field ID: BRMGAS04

Date Prepared: 03/31/95

Matrix: Sediment/Soil

Project Officer: Norm Peck

Date Analyzed: 04/04/95

Units: % Recovery

Analyte	Result	Qualifier
Antimony	0	
Beryllium	93	
Cadmium	85	
Chromium	88	
Copper	90	
Lead	84	
Nickel	86	
Silver	67	
Zinc	80	

Authorized By: 

Release Date: 4/6/95

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2

Manchester Environmental Laboratory

Department of Ecology

Analysis Report for Inductively Coupled Plasma

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: 95138023 (Matrix Spike - LMX2)

Date Received: 03/29/95

Method: EPA200.7

Field ID: BRMGAS04

Date Prepared: 03/31/95

Matrix: Sediment/Soil

Project Officer: Norm Peck

Date Analyzed: 04/04/95

Units: % Recovery

Analyte	Result	Qualifier
---------	--------	-----------

Antimony	0	
Beryllium	93	
Cadmium	86	
Chromium	93	
Copper	85	
Lead	84	
Nickel	90	
Silver	86	
Zinc	85	

Authorized By: 

Release Date: 4/6/95

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3

State of Washington Department of Ecology
Manchester Environmental Laboratory
7411 Beach Dr. East Port Orchard WA. 98366
April 28, 1995

RECEIVED
MAY - 3 1995
DEPT. OF ECOLOGY

Project: Old Bremerton Gasworks
Samples: 138023
Laboratory: Sound Analytical Services, Inc. 47726
By: Karin Feddersen KCF

These samples were received at the Manchester Laboratory on March 29, 1995, and were sent to Sound Analytical Services, Inc. on April 6, 1995 for TOC analysis using the following methods: Puget Sound Estuary Program.

HOLDING TIMES

The PSEP TOC holding time for frozen sediments is six (6) months. No studies to my knowledge have been performed to indicate the effect of holding time on samples that have not been stored frozen prior to analysis. Therefore an evaluation of the results with regard to holding time is not feasible. The samples were stored in the proper containers at 4 degrees C until analysis.

PROCEDURAL BLANKS

The procedural blanks associated with these samples have demonstrated that the processes are free from contamination.

CHECK STANDARDS

All recoveries were within QC limits of 75% to 125%.

TRIPLICATE:

The sample was analyzed in triplicate. The % Relative Standard Deviation (RSD) is within QC limits of 20%.

SUMMARY

For consistency with Manchester Laboratory protocol, all non-detect results have been qualified with a "U" - "The analyte was not detected at or above the reported result". This data is acceptable for use as amended.

SOUND ANALYTICAL SERVICE, INC.

ANALYTICAL & ENVIRONMENTAL CHEMISTS

4813 PACIFIC HIGHWAY EAST, TACOMA, WASHINGTON 98424 - TELEPHONE (206)922-2310 - FAX (206)922-5047

Report To: WA Department of Ecology Date: April 26, 1995

Report On: Analysis of Soil Lab No.: 47726

IDENTIFICATION:

Sample received on 04-06-95

Project: Old Bremerton Gasworks

ANALYSIS:

Lab Sample No. 47726-1

Client ID: 138023

General Chemistry
Date Analyzed: 4-21-95
Units: mg/kg

<u>Parameter</u>	<u>Method</u>	<u>Result</u>	<u>PQL</u>
Total Organic Carbon	PSEP	60,000	100

ND - Not Detected

PQL - Practical Quantitation Limit

SOUND ANALYTICAL SERVICES, INC.

ANALYTICAL & ENVIRONMENTAL CHEMISTS

4813 PACIFIC HIGHWAY EAST, TACOMA, WASHINGTON 98424 - TELEPHONE (206) 922-2310 - FAX (206) 922-5047

QUALITY CONTROL REPORT

Total Organic Carbon per Puget Sound Estuary Protocol

Client: WA Department of Ecology
Lab No: 47726qc
Units: mg/kg

Date Analyzed: 4-21-95

METHOD BLANK

Parameter	Result	PQL
Total Organic Carbon	100U ND KF	100

ND - Not Detected

PQL - Practical Quantitation Limit

TRIPLICATE

Triplicate No. 47726-1

Parameter	Sample Result	Duplicate Result	Triplicate Result	%RSD
Total Organic Carbon	60,200	64,700	61,900	3.6

% RSD = Percent Relative Standard Deviation

CHECK STANDARDS

Environmental Research Associates

Parameter	Result	True Value	% D
Total Organic Carbon	9,840	10,000	1.6
Total Organic Carbon	39,040	40,000	2.4
Total Organic Carbon	60,470	60,000	0.8

% D = Percent Difference

MANCHESTER ENVIRONMENTAL LABORATORY
7411 Beach Drive E , Port Orchard Washington 98366

RECEIVED
MAY 15 1995
DEPT. OF ECOLOGY

CASE NARRATIVE

May 10, 1995

RECEIVED
MAY 19 1995

DEPT. OF ECOLOGY

Subject: Old Bremerton Gasworks
Samples: 95 - 138020, -138022 and -138023
Case No. 1729-95
Officer: Norm Peck
By: Dickey D. Huntamer *DDH*
Organics Analysis Unit

SEMIVOLATILE ORGANICS

ANALYTICAL METHODS:

The semivolatile soil samples were extracted with acetone following the Manchester modification of the EPA CLP and SW 846 8270 procedure with capillary GC/MS analysis of the sample extracts. Normal QA/QC procedures were performed with the analyses.

HOLDING TIMES:

All sample and extraction holding times were within the recommended limits.

BLANKS:

Low levels of some target compounds were detected in the laboratory blanks. These included a number of the polynuclear aromatic hydrocarbons (PAH). The EPA five times rule was applied to all target compounds which were found in the blank. Compounds that were found in the sample and in the blank were considered real and not the result of contamination if the levels in the sample are greater than or equal to five times the amount of compounds in the associated method blank. Almost all of the PAH compounds were found at concentrations significantly greater than five times the blank.

SURROGATES:

The normal Manchester Laboratory surrogates were added to the sample prior to extraction. All of the samples had to be diluted for analysis and this may explain some of the variations in surrogate recoveries. Another factor may be the high PAH concentrations which could have interfered with some of the surrogates. Sample -138022 had low acid surrogate recoveries and all acid components were "J" qualified. The matrix spikes run on this same sample (-138022) also had low acid compound recoveries. This may indicate a possible matrix effect.

MATRIX SPIKE AND MATRIX SPIKE DUPLICATE:

Matrix spike recoveries were low or non existent for a number of compounds and these were flagged as "RET" in the matrix source sample, -138022. Low recoveries were also observed in the matrix spikes for the acid compounds and these compounds were "J" qualified.

ANALYTICAL COMMENTS:

The high PAH concentrations in the sample caused several problems. These included poor acid surrogate and acid matrix spike recoveries for sample -138022. Dilution's also had to be run on the samples to bring the high PAH concentrations into the linear calibration range. The results from the dilution's were substituted for the "E" flagged data in the reports. The data is acceptable for use as qualified.

DATA QUALIFIER CODES:

- U - The analyte was not detected at or above the reported value.
- J - The analyte was positively identified. The associated numerical value is an estimate.
- UJ - The analyte was not detected at or above the reported estimated result.
- REJ - The data are unusable for all purposes.
- EXP - The result is equal to the number before EXP times 10 to the power of the number after EXP. As an example 3EXP6 equals 3×10^6 .
- NAP - Not analyzed for.
- N - For organic analytes there is evidence the analyte is present in this sample.
- NJ - There is evidence that the analyte is present. The associated numerical result is an estimate.
- E - This qualifier is used when the concentration of the associated value exceeds the known calibration range.
- bold - The analyte was present in the sample. (Visual Aid to locate detected compound on report sheet.)

CN_OBREM.DOC

Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Base/Neutral/Acids + all TIC's

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: 95138020

Date Received: 03/29/95

Method: SW8270

Field ID: BRMGAS01

Date Prepared: 03/30/95

Matrix: Sediment/Soil

Project Officer: Norm Peck

Date Analyzed: 04/27/95

Units: ug/Kg

Analyte	Result	Qualifier	Analyte	Result	Qualifier
N-Nitrosodimethylamine	11500	U	2,4-Dinitrophenol	231000	UJ
Pyridine	23100	U	4-Nitrophenol	57700	U
Aniline	11500	U	Dibenzofuran	355000	
Phenol	11500	U	2,4-Dinitrotoluene	57700	U
Bis(2-Chloroethyl)Ether	11500	U	Diethylphthalate	11500	U
2-Chlorophenol	11500	U	Fluorene	6070000	
1,3-Dichlorobenzene	11500	U	4-Chlorophenyl-Phenylether	11500	U
1,4-Dichlorobenzene	11500	U	4-Nitroaniline	11500	U
1,2-Dichlorobenzene	11500	U	4,6-Dinitro-2-Methylphenol	231000	U
Benzyl Alcohol	11500	U	N-Nitrosodiphenylamine	11500	U
2-Methylphenol	11500	U	4-Bromophenyl-Phenylether	11500	U
Bis(2-Chloroisopropyl)Ether	11500	U	Hexachlorobenzene	11500	U
N-Nitroso-Di-N-Propylamine	11500	U	Pentachlorophenol	57700	U
4-Methylphenol	11500	U	Phenanthrene	24400000	
Hexachloroethane	11500	U	Anthracene	9740000	
Nitrobenzene	11500	U	Caffeine	58082	U
Isophorone	11500	U	Carbazole	100000	
2-Nitrophenol	11500	U	Di-N-Butylphthalate	11500	U
2,4-Dimethylphenol	11500	U	Fluoranthene	12500000	
Bis(2-Chloroethoxy)Methane	11500	U	Benzidine	23100	U
Benzoic Acid	115000	U	Pyrene	17700000	
2,4-Dichlorophenol	11500	U	Retene	11500	U
1,2,4-Trichlorobenzene	11500	U	Butylbenzylphthalate	11500	U
Naphthalene	6700000		Benzo(a)anthracene	3740000	
4-Chloroaniline	11500	U	3,3'-Dichlorobenzidine	23100	U
Hexachlorobutadiene	11500	U	Chrysene	4160000	
4-Chloro-3-Methylphenol	11500	U	Bis(2-Ethylhexyl) Phthalate	11500	U
2-Methylnaphthalene	1190000		Di-N-Octyl Phthalate	11500	U
Hexachlorocyclopentadiene	11500	U	Benzo(b)fluoranthene	2720000	
2,4,6-Trichlorophenol	11500	U	Benzo(k)fluoranthene	734000	
2,4,5-Trichlorophenol	11500	U	Benzo(a)pyrene	1810000	
2-Chloronaphthalene	11500	U	Indeno(1,2,3-cd)pyrene	1230000	
2-Nitroaniline	11500	U	3B-Coprostanol	115000	UJ
Dimethylphthalate	11500	U	Dibenzo(a,h)anthracene	262000	
2,6-Dinitrotoluene	57700	U	Benzo(ghi)perylene	1420000	
Acenaphthylene	5830000				
3-Nitroaniline	23100	U			
Acenaphthene	545000				

Authorized By:

Release Date:

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Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Base/Neutral/Acids + all TIC's

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: 95138020

Date Received: 03/29/95

Method: SW8270

Field ID: BRMGAS01

Date Prepared: 03/30/95

Matrix: Sediment/Soil

Project Officer: Norm Peck

Date Analyzed: 04/27/95

Units: ug/Kg

Surrogate Recoveries

2-Fluorophenol	102	%
D5-Phenol	108	%
D4-2-Chlorophenol	96	%
D4-1,2-Dichlorobenzene	150	%
D5-Nitrobenzene	91	%
2-Fluorobiphenyl	140	%
D10-Pyrene	0.0	%
D14-Terphenyl	185	%

Authorized By: 

Release Date: 5/10/95

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Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Base/Neutral/Acids + all TIC's

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: 95138020

Date Received: 03/29/95

Method: SW8270

Field ID: BRMGAS01

Date Prepared: 03/30/95

Matrix: Sediment/Soil

Project Officer: Norm Peck

Date Analyzed: 04/27/95

Units: ug/Kg

Tentatively Identified Compounds

CAS Number	Analyte Description	Result	Qualifier
90120	Naphthalene, 1-Methyl-	1050000	NJ
92524	1,1'-Biphenyl	229000	NJ
16587409	Benzo[b]thiophene, 2,7-Dimethyl-	345000	NJ
575371	Naphthalene, 1,7-Dimethyl-	3300000	NJ
571584	Naphthalene, 1,4-Dimethyl-	3240000	NJ
581420	Naphthalene, 2,6-Dimethyl-	1920000	NJ
827543	Naphthalene, 2-Ethenyl-	933000	NJ
581408	Naphthalene, 2,3-Dimethyl-	1780000	NJ
2245387	Naphthalene, 1,6,7-Trimethyl	547000	NJ
2131422	Naphthalene, 1,4,6-Trimethyl-	656000	NJ
829265	Naphthalene, 2,3,6-Trimethyl-	1060000	NJ
2131411	Naphthalene, 1,4,5-Trimethyl-	417000	NJ
203805	1H-Phenylene	1000000	NJ
*3001901	PAH unknown 01	1060000	NJ
7320538	Dibenzofuran, 4-Methyl-	484000	NJ
1730376	9h-Fluorene, 1-Methyl-	2420000	NJ
1556996	9h-Fluorene, 4-Methyl-	1480000	NJ
1430973	9h-Fluorene, 2-Methyl-	1080000	NJ
132650	Thiophene, Dibenzo[B,D]-	4550000	NJ
16587523	Dibenzothiophene, 3-Methyl-	1620000	NJ
613127	Anthracene, 2-Methyl-	4700000	NJ
610480	Anthracene, 1-Methyl-	5760000	NJ
*3001902	PAH unknown 02	8340000	NJ
832644	Phenanthrene, 4-Methyl-	3960000	NJ
35465715	2-Phenylanthracene	2730000	NJ
84651	9,10-Anthracenedione	2600000	NJ
3674655	Phenanthrene, 2,3-Dimethyl-	1890000	NJ
*3001903	PAH unknown 03	361000	NJ
243174	11h-Benzo[B]Fluorene	133000	NJ
238846	11h-Benzo[A]Fluorene	144000	NJ
2381217	Pyrene, 1-Methyl-	92500	NJ
3353126	Pyrene, 4-Methyl-	149000	NJ
3442782	Pyrene, 2-Methyl-	100000	NJ
*3005004	Unknown Hydrocarbon 04	182000	NJ
82053	7H-Benz[de]anthracen-7-one	176000	NJ

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Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Base/Neutral/Acids + all TIC's

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: 95138020

Date Received: 03/29/95

Method: SW8270

Field ID: BRMGAS01

Date Prepared: 03/30/95

Matrix: Sediment/Soil

Project Officer: Norm Peck

Date Analyzed: 04/27/95

Units: ug/Kg

Tentatively Identified Compounds (continued)

CAS Number	Analyte Description	Result	Qualifier
192972	Pyrene, Benzo[E]-	1940000	NJ

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Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Base/Neutral/Acids + all TIC's

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: 95138022

Date Received: 03/29/95

Method: SW8270

Field ID: BRMGAS03

Date Prepared: 03/30/95

Matrix: Sediment/Soil

Project Officer: Norm Peck

Date Analyzed: 04/27/95

Units: ug/Kg

Analyte	Result	Qualifier	Analyte	Result	Qualifier
N-Nitrosodimethylamine	318	U	2,4-Dinitrophenol	6360	UJ
Pyridine	636	U	4-Nitrophenol	1590	UJ
Aniline	318	U	Dibenzofuran	1730	
Phenol	318	UJ	2,4-Dinitrotoluene	1590	U
Bis(2-Chloroethyl)Ether	318	U	Diethylphthalate	318	U
2-Chlorophenol	318	UJ	Fluorene	4330	
1,3-Dichlorobenzene	318	U	4-Chlorophenyl-Phenylether	318	U
1,4-Dichlorobenzene	318	U	4-Nitroaniline		REJ
1,2-Dichlorobenzene	318	U	4,6-Dinitro-2-Methylphenol	6360	UJ
Benzyl Alcohol	318	UJ	N-Nitrosodiphenylamine	318	U
2-Methylphenol	318	UJ	Hydrazine, 1,2-Diphenyl-	318	U
Bis(2-Chloroisopropyl)Ether	318	U	4-Bromophenyl-Phenylether	318	U
N-Nitroso-Di-N-Propylamine	318	U	Hexachlorobenzene	318	U
4-Methylphenol	318	UJ	Pentachlorophenol	1590	UJ
Hexachloroethane	318	U	Phenanthrene	100000	
Nitrobenzene	318	U	Anthracene	26000	
Isophorone	318	U	Caffeine	318	U
2-Nitrophenol	318	UJ	Carbazole	1190	
2,4-Dimethylphenol		REJ	Di-N-Butylphthalate	318	U
Bis(2-Chloroethoxy)Methane	318	UJ	Fluoranthene	81000	
Benzoic Acid	3180	UJ	Benzidine	636	U
2,4-Dichlorophenol	318	UJ	Pyrene	90000	
1,2,4-Trichlorobenzene	318	U	Retene	318	U
Naphthalene	14100		Butylbenzylphthalate	318	U
4-Chloroaniline		REJ	Benzo(a)anthracene	15800	
Hexachlorobutadiene	318	U	3,3'-Dichlorobenzidine	636	U
4-Chloro-3-Methylphenol	318	UJ	Chrysene	23600	
2-Methylnaphthalene	8590		Bis(2-Ethylhexyl) Phthalate	318	U
Hexachlorocyclopentadiene	318	UJ	Di-N-Octyl Phthalate	318	U
2,4,6-Trichlorophenol	318	UJ	Benzo(b)fluoranthene	10800	
2,4,5-Trichlorophenol	318	UJ	Benzo(k)fluoranthene	4340	
2-Chloronaphthalene	318	U	Benzo(a)pyrene	7830	
2-Nitroaniline	318	U	Indeno(1,2,3-cd)pyrene	3660	
Dimethylphthalate	318	U	3B-Coprostanol	3180	U
2,6-Dinitrotoluene	1590	U	Dibenzo(a,h)anthracene	1060	
Acenaphthylene	7770		Benzo(ghi)perylene	3940	
3-Nitroaniline		REJ			
Acenaphthene	276	J			

Authorized By:

Dr. [Signature]

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Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Base/Neutral/Acids + all TIC's

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: 95138022

Date Received: 03/29/95

Method: SW8270

Field ID: BRMGAS03

Date Prepared: 03/30/95

Matrix: Sediment/Soil

Project Officer: Norm Peck

Date Analyzed: 04/27/95

Units: ug/Kg

Surrogate Recoveries

2-Fluorophenol	4	%
D5-Phenol	4	%
D4-2-Chlorophenol	5	%
D4-1,2-Dichlorobenzene	60	%
D5-Nitrobenzene	57	%
2-Fluorobiphenyl	79	%
D10-Pyrene	44	%
D14-Terphenyl	65	%

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Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Base/Neutral/Acids + all TIC's

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: 95138022

Date Received: 03/29/95

Method: SW8270

Field ID: BRMGAS03

Date Prepared: 03/30/95

Matrix: Sediment/Soil

Project Officer: Norm Peck

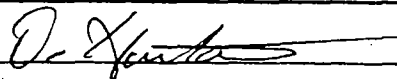
Date Analyzed: 04/27/95

Units: ug/Kg

Tentatively Identified Compounds

CAS Number	Analyte Description	Result	Qualifier
486259	9h-Fluoren-9-One	5850	NJ
132650	Thiophene, Dibenzo[B,D]-	7900	NJ
5394865	1h-Indene, 1-(Phenylmethylene)-	7660	NJ
613127	Anthracene, 2-Methyl-	11100	NJ
832713	Phenanthrene, 3-Methyl-	17000	NJ
4505480	1h-Indene, 2-Phenyl- (9ci)	7000	NJ
203645	4h-Cyclopenta[Def]Phenanthrene	21300	NJ
832699	Phenanthrene, 1-Methyl-	10400	NJ
35465715	2-Phenylnaphthalene	25400	NJ
3674655	Phenanthrene, 2,3-Dimethyl-	13200	NJ
5737133	Cyclopenta(def)phenanthreno	9300	NJ
*3001901	PAH unknown 01	10400	NJ
243174	11h-Benzo[B]Fluorene	2760	NJ
2381217	Pyrene, 1-Methyl-	4020	NJ
3442782	Pyrene, 2-Methyl-	3690	NJ
238846	11h-Benzo[A]Fluorene	2960	NJ
195197	Benzo[c]phenanthrene	4770	NJ

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Release Date:

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Master Environmental Laboratory

Department of Ecology

Analysis Report for

Base/Neutral/Acids + all TIC's

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: 95138022 (Matrix Spike - LMX1) Date Received: 03/29/95

Method: SW8270

Field ID: BRMGAS03

Date Prepared: 03/30/95

Matrix: Sediment/Soil

Project Officer: Norm Peck

Date Analyzed: 04/27/95

Units: % Recovery

Analyte	Result	Qualifier	Analyte	Result	Qualifier
N-Nitrosodimethylamine		NAR	2,4-Dinitrophenol	31	
Pyridine		NAR	4-Nitrophenol	70	
Aniline		NAR	Dibenzofuran	96	
Phenol	16		2,4-Dinitrotoluene	74	
Bis(2-Chloroethyl)Ether	95		Diethylphthalate	100	
2-Chlorophenol	14		Fluorene	41	
1,3-Dichlorobenzene	81		4-Chlorophenyl-Phenylether	98	
1,4-Dichlorobenzene	87		4-Nitroaniline		REJ
1,2-Dichlorobenzene	88		4,6-Dinitro-2-Methylphenol	50	
Benzyl Alcohol	90		Hydrazine, 1,2-Diphenyl-		NAR
2-Methylphenol	2		4-Bromophenyl-Phenylether	95	
Bis(2-Chloroisopropyl)Ether	92		Hexachlorobenzene	93	
N-Nitroso-Di-N-Propylamine	86		Pentachlorophenol	52	
2-Methylphenol	6		Phenanthrene		NAR
Hexachloroethane	81		Anthracene		NAR
Nitrobenzene	82		Caffeine		
Sophorone	93		Di-N-Butylphthalate	104	
4-Nitrophenol	78		Fluoranthene		NAR
2,4-Dimethylphenol		REJ	Benzidine		NAR
Bis(2-Chloroethoxy)Methane	94		Pyrene		NAR
Benzoic Acid	115		Butylbenzylphthalate	100	
2,4-Dichlorophenol	39		Benzo(a)anthracene		NAR
1,2,4-Trichlorobenzene	88		Chrysene		NAR
Naphthalene	61		Bis(2-Ethylhexyl) Phthalate	105	
Chloroaniline		REJ	Di-N-Octyl Phthalate	98	
Hexachlorobutadiene	87		Benzo(b)fluoranthene	241	
Chloro-3-Methylphenol	25		Benzo(k)fluoranthene	140	
Methylnaphthalene	54		Benzo(a)pyrene	62	
Hexachlorocyclopentadiene	18		Indeno(1,2,3-cd)pyrene	112	
4,6-Trichlorophenol	18		3B-Coprostanol		NAR
4,5-Trichlorophenol	78		Dibenzo(a,h)anthracene	45	
Chloronaphthalene	88		Benzo(ghi)perylene	106	
Nitroaniline	70				
2-Methylphthalate	95		Surrogate Recoveries		
2,5-Dinitrotoluene	81				
1-Naphthylene	74		2-Fluorophenol	9	%
Nitroaniline		REJ	D5-Phenol	12	%
1-Naphthene	86		D4-2-Chlorophenol	12	%

Authorized By:

D. Santa

Release Date:

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Mane. ster Environmental Laboratory

Department of Ecology

Analysis Report for

Base/Neutral/Acids + all TIC's

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: 95138022 (Matrix Spike - LMX1)

Date Received: 03/29/95

Method: SW8270

Field ID: BRMGAS03

Date Prepared: 03/30/95

Matrix: Sediment/Soil

Project Officer: Norm Peck

Date Analyzed: 04/27/95

Units: % Recovery

Surrogate Recoveries (continued)

D4-1,2-Dichlorobenzene	92	%
D5-Nitrobenzene	87	%
2-Fluorobiphenyl	104	%
D10-Pyrene	75	%
D14-Terphenyl	91	%

Authorized By:

D. Hunter

Release Date:

5/10/95

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Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Base/Neutral/Acids + all TIC's

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: 95138022 (Matrix Spike - LMX2)

Date Received: 03/29/95

Method: SW8270

Field ID: BRMGAS03

Date Prepared: 03/30/95

Matrix: Sediment/Soil

Project Officer: Norm Peck

Date Analyzed: 04/27/95

Units: % Recovery

Analyte	Result	Qualifier	Analyte	Result	Qualifier
N-Nitrosodimethylamine		NAR	2,4-Dinitrophenol	31	
Pyridine		NAR	4-Nitrophenol	66	
Aniline		NAR	Dibenzofuran	94	
Phenol	12		2,4-Dinitrotoluene	69	
Bis(2-Chloroethyl)Ether	84		Diethylphthalate	90	
2-Chlorophenol	11		Fluorene	32	
1,3-Dichlorobenzene	71		4-Chlorophenyl-Phenylether	88	
1,4-Dichlorobenzene	75		4-Nitroaniline	17	
1,2-Dichlorobenzene	76		4,6-Dinitro-2-Methylphenol	44	
Benzyl Alcohol	83		Hydrazine, 1,2-Diphenyl-		NAR
2-Methylphenol	3		4-Bromophenyl-Phenylether	90	
Bis(2-Chloroisopropyl)Ether	81		Hexachlorobenzene	85	
N-Nitroso-DI-N-Propylamine	81		Pentachlorophenol	49	
1-Methylphenol	6		Phenanthrene		NAR
Hexachloroethane	67		Anthracene		NAR
Nitrobenzene	74		Caffeine		
Isophorone	82		Di-N-Butylphthalate	96	
1-Nitrophenol	70		Fluoranthene		NAR
1,4-Dimethylphenol	3		Benzidine		
Bis(2-Chloroethoxy)Methane	83		Pyrene		NAR
Benzoic Acid	126		Butylbenzylphthalate	93	
1,4-Dichlorophenol	32		Benzo(a)anthracene		NAR
1,2,4-Trichlorobenzene	78		Chrysene		NAR
Naphthalene		NAR	Bis(2-Ethylhexyl) Phthalate	99	
1-Chloroaniline		REJ	Di-N-Octyl Phthalate	93	
Hexachlorobutadiene	76		Benzo(b)fluoranthene	245	
1-Chloro-3-Methylphenol	23		Benzo(k)fluoranthene	94	
1-Methylnaphthalene	47		Benzo(a)pyrene	40	
Hexachlorocyclopentadiene		REJ	3B-Coprostanol		NAR
1,4,6-Trichlorophenol	15		Indeno(1,2,3-cd)pyrene	115	
1,4,5-Trichlorophenol	63		Dibenzo(a,h)anthracene	38	
1-Chloronaphthalene	79		Benzo(ghi)perylene	120	
1-Nitroaniline	63				
Dimethylphthalate	86		Surrogate Recoveries		
1,6-Dinitrotoluene	69				
1-Cenaphthylene	58		2-Fluorophenol	7	%
1-Nitroaniline		REJ	D5-Phenol	9	%
1-Cenaphthene	77		D4-2-Chlorophenol	9	%

Authorized By:

[Signature]

Release Date:

5/10/95

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Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Base/Neutral/Acids + all TIC's

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: 95138022 (Matrix Spike - LMX2)

Date Received: 03/29/95

Method: SW8270

Field ID: BRMGAS03

Date Prepared: 03/30/95

Matrix: Sediment/Soil

Project Officer: Norm Peck

Date Analyzed: 04/27/95

Units: % Recovery

Surrogate Recoveries (continued)

D4-1,2-Dichlorobenzene	80	%
D5-Nitrobenzene	79	%
2-Fluorobiphenyl	94	%
D10-Pyrene	69	%
D14-Terphenyl	88	%

Authorized By:



Release Date:

5/10/95

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Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Base/Neutral/Acids + all TIC's

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: 95138023

Date Received: 03/29/95

Method: SW8270

Field ID: BRMGAS04

Date Prepared: 03/30/95

Matrbx: Sediment/Soil

Project Officer: Norm Peck

Date Analyzed: 04/28/95

Units: ug/Kg

Analyte	Result	Qualifier	Analyte	Result	Qualifier
N-Nitrosodimethylamine	394	U	2,4-Dinitrophenol	7870	U
Pyridine	787	U	4-Nitrophenol	1970	U
Aniline	394	U	Dibenzofuran	1710	
Phenol	394	UJ	2,4-Dinitrotoluene	1970	U
Bis(2-Chloroethyl)Ether	394	U	Diethylphthalate	394	U
2-Chlorophenol	394	U	Fluorene	10200	
1,3-Dichlorobenzene	394	U	4-Chlorophenyl-Phenylether	394	U
1,4-Dichlorobenzene	394	U	4-Nitroaniline	394	U
1,2-Dichlorobenzene	394	U	4,6-Dinitro-2-Methylphenol	7870	U
Benzyl Alcohol	394	U	N-Nitrosodiphenylamine	394	U
2-Methylphenol	394	U	Hydrazine, 1,2-Diphenyl-	394	U
Bis(2-Chloroisopropyl)Ether	394	U	4-Bromophenyl-Phenylether	394	U
N-Nitroso-Di-N-Propylamine	394	U	Hexachlorobenzene	394	U
4-Methylphenol	394	U	Pentachlorophenol	1970	U
Hexachloroethane	394	U	Phenanthrene	102000	
Nitrobenzene	394	U	Anthracene	43800	
Isophorone	394	U	Caffeine	394	U
2-Nitrophenol	394	U	Carbazole	1170	
2,4-Dimethylphenol	394	U	Di-N-Butylphthalate	394	U
Bis(2-Chloroethoxy)Methane	394	U	Fluoranthene	122000	
Benzoic Acid	3940	U	Benzdine	787	U
2,4-Dichlorophenol	394	U	Pyrene	159000	
1,2,4-Trichlorobenzene	394	U	Retene	394	U
Naphthalene	15700		Butylbenzylphthalate	394	U
4-Chloroaniline	394	U	Benzo(a)anthracene	45200	
Hexachlorobutadiene	394	U	3,3'-Dichlorobenzidine	787	U
4-Chloro-3-Methylphenol	394	U	Chrysene	52100	
2-Methylnaphthalene	7610		Bis(2-Ethylhexyl) Phthalate	394	U
Hexachlorocyclopentadiene	394	U	Di-N-Octyl Phthalate	394	U
2,4,6-Trichlorophenol	394	U	Benzo(b)fluoranthene	42700	
2,4,5-Trichlorophenol	394	U	Benzo(k)fluoranthene	16100	
2-Chloronaphthalene	394	U	Benzo(a)pyrene	47600	
2-Nitroaniline	394	U	Indeno(1,2,3-cd)pyrene	27300	
Dimethylphthalate	394	U	3B-Coprostanol	3940	UJ
2,6-Dinitrotoluene	1970	U	Dibenzo(a,h)anthracene	5650	
Acenaphthylene	24500		Benzo(ghi)perylene	35100	
3-Nitroaniline	787	U			
Acenaphthene	15300				

Authorized By: D. [Signature]

Release Date: 5/10/95

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Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Base/Neutral/Acids + all TIC's

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: 95138023

Date Received: 03/29/95

Method: SW8270

Field ID: BRMGAS04

Date Prepared: 03/30/95

Matrix: Sediment/Soil

Project Officer: Norm Peck

Date Analyzed: 04/28/95

Units: ug/Kg

Surrogate Recoveries

2-Fluorophenol	89	%
D5-Phenol	86	%
D4-2-Chlorophenol	86	%
D4-1,2-Dichlorobenzene	77	%
D5-Nitrobenzene	86	%
2-Fluorobiphenyl	104	%
D10-Pyrene	98	%
D14-Terphenyl	98	%

Authorized By:

D. K. [Signature]

Release Date:

5/10/95

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Mancaster Environmental Laboratory

Department of Ecology

Analysis Report for

Base/Neutral/Acids + all TIC's

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: 95138023

Date Received: 03/29/95

Method: SW8270

Field ID: BRMGAS04

Date Prepared: 03/30/95

Matrix: Sediment/Soil

Project Officer: Norm Peck

Date Analyzed: 04/28/95

Units: ug/Kg

Tentatively Identified Compounds

CAS Number	Analyte Description	Result	Qualifier
90120	Naphthalene, 1-Methyl-	8340	NJ
*3008001	Unknown 01	2120	NJ
54676390	Cyclohexane, 2-butyl-1,1,3	5240	NJ
581408	Naphthalene, 2,3-Dimethyl-	14800	NJ
573988	Naphthalene, 1,2-Dimethyl-	26200	NJ
2131422	Naphthalene, 1,4,6-Trimethyl-	12000	NJ
2131411	Naphthalene, 1,4,5-Trimethyl-	13200	NJ
2245387	Naphthalene, 1,6,7-Trimethyl	11300	NJ
24324172	Fluorene-9-methanol	12000	NJ
1989339	9H-Fluorene-9-carboxylic ac	14900	NJ
1730376	9h-Fluorene, 1-Methyl-	15000	NJ
1430973	9h-Fluorene, 2-Methyl-	12200	NJ
2523377	9h-Fluorene, 9-Methyl-	11000	NJ
132650	Thiophene, Dibenzo[B,D]-	23300	NJ
613127	Anthracene, 2-Methyl-	29500	NJ
610480	Anthracene, 1-Methyl-	17500	NJ
832713	Phenanthrene, 3-Methyl-	14000	NJ
203645	4h-Cyclopenta[Def]Phenanthrene	55200	NJ
2531842	Phenanthrene, 2-Methyl-	21900	NJ
35465715	2-Phenylnaphthalene	26400	NJ
3674666	Phenanthrene, 2,5-Dimethyl-	20100	NJ
886668	Benzene, 1,1'-(1,3-Butadiyne)	35400	NJ
243174	11h-Benzo[B]Fluorene	4580	NJ
238846	11h-Benzo[A]Fluorene	4490	NJ
3442782	Pyrene, 2-Methyl-	3800	NJ
3353126	Pyrene, 4-Methyl-	3180	NJ
2381217	Pyrene, 1-Methyl-	2740	NJ
*3001901	PAH unknown 01	4990	NJ
82053	7H-Benz[de]anthracen-7-one	2420	NJ
1705846	Triphenylene, 2-Methyl-	3180	NJ
612782	2,2'-Binaphthalene	792	NJ
192972	Pyrene, Benzo[E]-	31700	NJ
198550	Perylene	13500	NJ
*3001902	PAH unknown 02	7230	NJ

Authorized By: Q. Hunter

Release Date: 5/10/95

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Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Base/Neutral/Acids + all TIC's

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: BLN51438

Blank ID: BS5089

Project Officer: Norm Peck

Date Prepared: 03/30/95

Date Analyzed: 04/27/95

Method: SW8270

Matrix: Sediment/Soil

Units: ug/Kg

Analyte	Result	Qualifier	Analyte	Result	Qualifier
N-Nitrosodimethylamine	35.7	U	2,4-Dinitrophenol	714	UJ
Pyridine	71.4	U	4-Nitrophenol	178	U
Aniline	35.7	U	Dibenzofuran	3.7	J
Phenol	38.8		2,4-Dinitrotoluene	178	U
Bis(2-Chloroethyl)Ether	35.7	U	Diethylphthalate	28.0	J
2-Chlorophenol	35.7	U	Fluorene	5.2	J
1,3-Dichlorobenzene	35.7	U	4-Chlorophenyl-Phenylether	5.0	J
1,4-Dichlorobenzene	35.7	U	4-Nitroaniline	35.7	U
1,2-Dichlorobenzene	35.7	U	4,6-Dinitro-2-Methylphenol	714	U
Benzyl Alcohol	35.7	U	N-Nitrosodiphenylamine	6.6	J
2-Methylphenol	35.7	U	Hydrazine, 1,2-Diphenyl-	35.7	U
Bis(2-Chloroisopropyl)Ether	35.7	U	4-Bromophenyl-Phenylether	35.7	U
N-Nitroso-Di-N-Propylamine	35.7	U	Hexachlorobenzene	5.1	J
4-Methylphenol	35.7	U	Pentachlorophenol	178	U
Hexachloroethane	35.7	U	Phenanthrene	10.8	J
Nitrobenzene	35.7	U	Anthracene	8.4	J
Isophorone	35.7	U	Caffeine	35.7	U
2-Nitrophenol	35.7	U	Carbazole	35.7	U
2,4-Dimethylphenol	35.7	U	Di-N-Butylphthalate	177	
Bis(2-Chloroethoxy)Methane	35.7	U	Fluoranthene	11.2	J
Benzoic Acid	20.9	J	Benzidine	71.4	U
2,4-Dichlorophenol	35.7	U	Pyrene	11.6	J
1,2,4-Trichlorobenzene	35.7	U	Retene	35.7	U
Naphthalene	35.7	U	Butylbenzylphthalate	12.7	J
4-Chloroaniline	35.7	U	Benzo(a)anthracene	14.3	J
Hexachlorobutadiene	35.7	U	3,3'-Dichlorobenzidine	71.4	U
4-Chloro-3-Methylphenol	35.7	U	Chrysene	12.1	J
2-Methylnaphthalene	35.7	U	Bis(2-Ethylhexyl) Phthalate	25.2	J
Hexachlorocyclopentadiene	35.7	U	Di-N-Octyl Phthalate	9.2	J
2,4,6-Trichlorophenol	35.7	U	Benzo(b)fluoranthene	10.8	J
2,4,5-Trichlorophenol	35.7	U	Benzo(k)fluoranthene	12.6	J
2-Chloronaphthalene	35.7	U	Benzo(a)pyrene	9.8	J
2-Nitroaniline	35.7	U	Indeno(1,2,3-cd)pyrene	10.6	J
Dimethylphthalate	35.7	U	3B-Coprostanol	732	J
2,6-Dinitrotoluene	178	U	Dibenzo(a,h)anthracene	10.2	J
Acenaphthylene	35.7	U	Benzo(ghi)perylene	10.3	J
3-Nitroaniline	71.4	U			
Acenaphthene	35.7	U			

Authorized By: De V. [Signature]

Release Date: 5/10/95

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Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Base/Neutral/Acids + all TIC's

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: BLN51438

Blank ID: BS5089

Project Officer: Norm Peck

Date Prepared: 03/30/95

Date Analyzed: 04/27/95

Method: SW8270

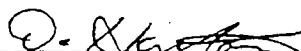
Matrix: Sediment/Soil

Units: ug/Kg

Surrogate Recoveries

2-Fluorophenol	90	%
2,5-Phenol	92	%
2,4-2-Chlorophenol	90	%
2,4-1,2-Dichlorobenzene	83	%
2,5-Nitrobenzene	87	%
2-Fluorobiphenyl	98	%
10-Pyrene	95	%
14-Terphenyl	99	%

Authorized By:



Release Date:

5/10/95

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Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Base/Neutral/Acids + all TIC's

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: BLNS1438

Method: SW8270

Blank ID: BS5089

Date Prepared: 03/30/95

Matrix: Sediment/Soil

Project Officer: Norm Peck

Date Analyzed: 04/27/95

Units: ug/Kg

Tentatively Identified Compounds

CAS Number	Analyte Description	Result	Qualifier
1708276	Furan, 2,3-dihydro-3-methyl	61.3	NJ
513859	2,3-Butanediol	120	NJ
4160752	2-Propanone, 1-Cyclopropyl-	75.4	NJ
108883	Toluene	181	NJ
141797	3-Penten-2-One, 4-Methyl-	993	NJ
1626091	2,7-Octanedione	7260	NJ
123422	4-Hydroxy-4-Methylpentan-2-one	159000	NJ
*3008001	Unknown 01	101	NJ
*3008002	Unknown 02	3300	NJ
110134	2,5-Hexanedione	57.1	NJ
74498887	Ethane, 1-Methoxy-2-(Methoxymethoxy)-	59.8	NJ
*3008003	Unknown 03	104	NJ
5343964	2-Butanol, 3-Methyl-, Acetate	301	NJ
*3008004	Unknown 04	47.5	NJ
*3008005	Unknown 05	450	NJ
*3008006	Unknown 06	48.1	NJ
541026	Cyclopentasiloxane, Decamethyl-	119	NJ
84640	1,2-Benzenedicarboxylic aci	48.6	NJ
*3005001	Unknown Hydrocarbon 01	45.8	NJ
*3005002	Unknown Hydrocarbon 02	63.9	NJ

Authorized By: Dr. [Signature]

Release Date: 5/10/95

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Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Base/Neutral/Acids + all TIC's

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: BLN51439

Method: SW8270

Blank ID: BS5089D

Date Prepared: 03/30/95

Matrx: Sediment/Soil

Project Officer: Norm Peck

Date Analyzed: 04/27/95

Units: ug/Kg

Analyte	Result	Qualifier	Analyte	Result	Qualifier
N-Nitrosodimethylamine	35.7	U	2,4-Dinitrophenol	714	UJ
Pyridine	71.4	U	4-Nitrophenol	178	U
Aniline	35.7	U	Dibenzofuran	178	U
Phenol	45.6		2,4-Dinitrotoluene	178	U
Bis(2-Chloroethyl)Ether	35.7	U	Diethylphthalate	21.7	J
2-Chlorophenol	35.7	U	Fluorene	1.4	J
1,3-Dichlorobenzene	35.7	U	4-Chlorophenyl-Phenylether	35.7	U
1,4-Dichlorobenzene	35.7	U	4-Nitroaniline	35.7	U
1,2-Dichlorobenzene	35.7	U	4,6-Dinitro-2-Methylphenol	714	U
Benzyl Alcohol	35.7	U	N-Nitrosodiphenylamine	35.7	U
2-Methylphenol	35.7	U	Hydrazine, 1,2-Diphenyl-	35.7	U
Bis(2-Chloroisopropyl)Ether	35.7	U	4-Bromophenyl-Phenylether	35.7	U
N-Nitroso-Di-N-Propylamine	35.7	U	Hexachlorobenzene	35.7	U
4-Methylphenol	35.7	U	Pentachlorophenol	178	U
Hexachloroethane	35.7	U	Phenanthrene	4.2	J
Nitrobenzene	35.7	U	Anthracene	1.9	J
Isophorone	35.7	U	Caffeine	35.7	U
2-Nitrophenol	35.7	U	Carbazole	35.7	U
2,4-Dimethylphenol	35.7	U	Di-N-Butylphthalate	301	
Bis(2-Chloroethoxy)Methane	35.7	U	Fluoranthene	4.0	J
Benzoic Acid	35.7	U	Benzidine	71.4	U
2,4-Dichlorophenol	35.7	U	Pyrene	4.2	J
1,2,4-Trichlorobenzene	35.7	U	Retene	35.7	U
Naphthalene	35.7	U	Butylbenzylphthalate	35.7	U
4-Chloroaniline	35.7	U	Benzo(a)anthracene	35.7	U
Hexachlorobutadiene	35.7	U	3,3'-Dichlorobenzidine	71.4	U
4-Chloro-3-Methylphenol	35.7	U	Chrysene	3.6	J
2-Methylnaphthalene	35.7	U	Bis(2-Ethylhexyl) Phthalate	17.1	J
Hexachlorocyclopentadiene	35.7	U	Di-N-Octyl Phthalate	35.7	U
2,4,6-Trichlorophenol	35.7	U	Benzo(b)fluoranthene	3.5	J
2,4,5-Trichlorophenol	35.7	U	Benzo(k)fluoranthene	3.1	J
2-Chloronaphthalene	35.7	U	Benzo(a)pyrene	2.9	J
2-Nitroaniline	35.7	U	Indeno(1,2,3-cd)pyrene	3.3	J
Dimethylphthalate	35.7	U	3B-Coprostanol	385	J
2,6-Dinitrotoluene	178	U	Dibenzo(a,h)anthracene	2.6	J
Acenaphthylene	35.7	U	Benzo(ghi)perylene	3.2	J
3-Nitroaniline	71.4	U			
Acenaphthene	35.7	U			

Authorized By: 

Release Date: 5/10/95

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Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Base/Neutral/Acids + all TIC's

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: BLN51439

Blank ID: BS5089D

Project Officer: Norm Peck

Date Prepared: 03/30/95

Date Analyzed: 04/27/95

Method: SW8270

Matrix: Sediment/Soil

Units: ug/Kg

Surrogate Recoveries

2-Fluorophenol	94	%
D5-Phenol	96	%
D4-2-Chlorophenol	94	%
D4-1,2-Dichlorobenzene	93	%
D5-Nitrobenzene	93	%
2-Fluorobiphenyl	101	%
D10-Pyrene	100	%
D14-Terphenyl	102	%

Authorized By: D. [Signature]

Release Date: 5/10/95

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Manchester Environmental Laboratory

Department of Ecology

Analysis Report for

Base/Neutral/Acids + all TIC's

Project Name: Old Bremerton Gasworks

LIMS Project ID: 1722-95

Sample: BLN51439

Method: SW8270

Blank ID: BS5089D

Date Prepared: 03/30/95

Matrix: Sediment/Soil

Project Officer: Norm Peck

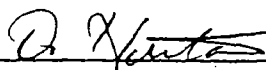
Date Analyzed: 04/27/95

Units: ug/Kg

Tentatively Identified Compounds

CAS Number	Analyte Description	Result	Qualifier
3102338	3-Penten-2-One, (E)-	85.4	NJ
109499	5-Hexen-2-one	75.9	NJ
108883	Toluene	279	NJ
25414226	Furan, 2-methoxy	1270	NJ
1626091	2,7-Octanedione	10100	NJ
123422	4-Hydroxy-4-Methylpentan-2-one	194000	NJ
*3008001	Unknown 01	112	NJ
*3008002	Unknown 02	3760	NJ
110134	2,5-Hexanedione	79.9	NJ
*3008003	Unknown 03	117	NJ
*3008004	Unknown 04	421	NJ
*3008005	Unknown 05	485	NJ
*3008006	Unknown 06	63.0	NJ
*3008007	Unknown 07	66.0	NJ
541026	Cyclopentasiloxane, Decamethyl-	132	NJ
89189	1,2-Benzenedicarboxylic Acid, Butyl 8-Methylnonyl Este	57.4	NJ
*3005001	Unknown Hydrocarbon 01	78.4	NJ
*3005002	Unknown Hydrocarbon 02	86.6	NJ
*3008008	Unknown 08	138	NJ

Authorized By:



Release Date:

5/10/95

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APPENDIX E

**WDOE File Information: Old Bremerton Gasworks/Sesko
Property**

OLD BREMERTON GASWORKS
Bremerton, KIT.

N-18-5030-000
SIT 2.1
TECHNICAL REPORTS
SEE ALSO:
PENN PLAZA AND
SESKO PROPERTY

96
9

2 sides
both
LDO
3.1.10

DEPARTMENT OF ECOLOGY - TOXICS CLEANUP PROGRAM
SITE DATA SUMMARY

Jan 10, 1996

SITE ID INFORMATION

TCP ID: N-18-5030-000

SITE NAME: Old Bremerton Gasworks

SITE LOCATION INFORMATION:

COUNTY:
18 Kitsap

ADDRESS:
1725 Pennsylvania Ave.

CLOSEST CITY:
Bremerton

ZIP CODE:
98310

DEGREES	MINUTES	SECONDS	METHOD	TOWNSHIP	RANGE	SECTION	TAX PARCEL #:
LONGITUDE: <u>122</u>	<u>37</u>	<u>50.00</u>	G	<u>24N</u>	<u>1E</u>	<u>14</u>	
LATITUDE: <u>47</u>	<u>34</u>	<u>40.00</u>					

LEGISLATIVE DISTRICT: 26

CONGRESSIONAL DISTRICT: 6

SITE STATUS INFORMATION:

RESPONSIBLE UNIT: NW NORTHWEST
SITE MANAGER: LIN, SUNNY

DATE ENTERED: Sep 22, 1994
LAST UPDATE DATE: Jan 8, 1996

ECOLOGY STATUS: <u>2</u>	STATUTE: <u>2</u>
INDEPENDENT STATUS:	PROGRAM PLAN:
WARM RANK: <u>1</u>	UBAT SITE: <u>X</u>
NFA CODE:	

EPA ID: PRELIMINARY ASSESSMENT RATING:
SITE INSPECTION RATING:

ERTS ID: N14321 UBI ID:
LUST ID: APRS PROJECT CODE:

SITE COMMENTS:

Site "aka" as Penn Plaza Industrial Park & SESCO property. Former coal gasification plant. Currently, unlabeled/uncontained drums, sp

AFFECTED MEDIA & CONTAMINANTS INFO:

MEDIA	STATUS	#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	#13	#14	#15	#16	#17	DW TYPE
1 Groundwater	S	S		S				S	S			S							
2 Surface Water	S	S						S	S			S							
4 Soil	C	C		S				S	C			C							
5 Sediment	C			S								C							

Name " Old Bremerton Gas Works
(Penn Plaza / SESCO Property)

Department of Ecology - Toxics Cleanup Program

Site Information System

Project Summary

1/10/96

TCP ID: N-18-5030-000
 SITE NAME: Old Bremerton Gasworks
 ALTERNATE NAME:

COMMENTS:
 Site "aka" as Penn Plaza Indus

COUNTY: Kitsap
 SITE MANAGER: SHL

SITE LOCATION: 1725 Pennsylvania Ave.
 Bremerton 98310

TCP ID	Activity Title	Lead Person	CURRENT DATES: ENTERED			Comments
			START	END	STATUS	
N-18-5030-000	Site Discovery/Report Received	SHL	07-15-93	07-20-93	Completed	Done by UBATS, Joanne Pol.
	Initial Investigation	SHL	08-24-93	04-11-94	Completed	
	Early Notice Letter(s)	SHL	09-23-94	09-23-94	Completed	
	Site Hazard Assessment	SHL	04-12-95	06-29-95	Completed	
	Hazardous Sites Listing	SHL	08-22-95	08-22-95	Completed	

DEPARTMENT OF ECOLOGY - TOXICS CLEANUP PROGRAM
SITE DATA SUMMARY

Jan 10, 1997

SITE ID INFORMATION

TCP ID: **N-18-5031-000**

SITE NAME: **Sesko Property**

SITE LOCATION INFORMATION:

COUNTY:
18 Kitsap

ADDRESS:
1700 Pennsylvania Ave.

CLOSEST CITY:
Bremerton

ZIP CODE:
98310

	DEGREES	MINUTES	SECONDS	METHOD	TOWNSHIP	RANGE	SECTION	TAX PARCEL #:
LONGITUDE:	122	38	31.00	G	24N	1E	14	
LATITUDE:	47	34	39.00					

LEGISLATIVE DISTRICT: **28**

CONGRESSIONAL DISTRICT: **6**

SITE STATUS INFORMATION:

RESPONSIBLE UNIT: **NW NORTHWEST**
SITE MANAGER: **NORTHWEST REGION**

DATE ENTERED: **Sep 22, 1994**
LAST UPDATE DATE: **Dec 11, 1995**

ECOLOGY STATUS:	2	STATUTE:	2
INDEPENDENT STATUS:		PROGRAM PLAN:	
WARM RANK:	1	UBAT SITE:	X
NFA CODE:			

EPA ID: PRELIMINARY ASSESSMENT RATING:
SITE INSPECTION RATING:

ERTS ID: **N15476** UBI ID:
LUST ID: APRS PROJECT CODE:

SITE COMMENTS:

Potential contamination from former coal gasification plant located on site. SHA done by SAIC

AFFECTED MEDIA & CONTAMINANTS INFO:

MEDIA	STATUS	#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	#13	#14	#15	#16	#17	DW TYPE
1 Groundwater	S			S				S				S							
4 Soil	C							S				C							
5 Sediment	S			S				S				S							

Department of Ecology - Toxics Cleanup Program

Site Information System

Project Summary

1/10/96

TCP ID: N-18-5031-000
SITE NAME: Sesko Property
ALTERNATE NAME:

COMMENTS:
Potential contamination from fi

COUNTY: Kitsap
SITE MANAGER: NRO

SITE LOCATION: 1700 Pennsylvania Ave.
Bremerton 98310

TCP ID	Activity Title	Lead Person	CURRENT DATES: ENTERED			Comments
			START	END	STATUS	
N-18-5031-000	Initial Investigation	NRO	08-24-93	04-11-94	Completed	Done by UBATS, Joanne Pol
	Early Notice Letter(s)	NRO	09-23-94	09-23-94	Completed	
	Site Discovery/Report Received	NRO	07-15-93	07-20-93	Completed	No action determined for set
	Hazardous Sites Listing	NRO	08-22-99	08-22-95	Completed	



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

P.O. Box 47600 • Olympia, Washington 98504-7600
(206) 407-6000 • TDD Only (Hearing Impaired) (206) 407-6006

July 21, 1995

Mr. Paul McConkey
Penn Plaza Industrial Park
1500 Thompson Drive
Bremerton, WA 98310

Subject: Site Hazard Assessment - Old Bremerton Gasworks/Penn
Plaza Industrial Park/Sesko Property

Dear Mr. McConkey:

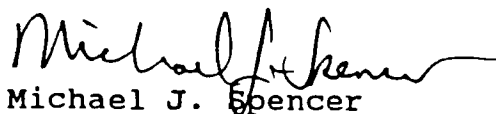
Ecology's contractor, SAIC, has completed the site hazard assessment (SHA) of Old Bremerton Gasworks/Penn Plaza Industrial Park/Sesko Property and Ecology concurs with their recommendation that this site requires scoring and ranking under the Model Toxics Control Act (MTCA).

This site's hazard ranking, an estimation of the potential threat to human health and/or the environment relative to all other Washington state sites assessed at this time, has been determined to be a "1", where 1 represents the highest relative risk and 5 the lowest.

For your information, Ecology will be publishing the ranking of this and other recently assessed sites in the August 22, 1995 Special Issue of the Site Register. The site hazard ranking will be used in conjunction with other site-specific considerations in determining Ecology's priority for future actions.

Please contact me at (360) 407-7195 if you have any questions/comments about the SHA/scoring/ranking of your site. For inquiries regarding any further activities at your site now that it is on Ecology's Hazardous Sites List, please call Norm Peck, Ecology Northwest Regional Office, at (206) 649-7047.

Sincerely,


Michael J. Spencer

cc: Norm Peck, Ecology NWRO
Scott C. Daniels, Bremerton-Kitsap County Health District

DEPARTMENT OF ECOLOGY - TOXICS CLEANUP PROGRAM
SITE DATA SUMMARY

JUL 17, 1995

SITE ID INFORMATION

TCP ID: N-18-5030-000 SITE NAME: Old Bremerton Gasworks

SITE LOCATION INFORMATION:

COUNTY: 18 Kitsap ADDRESS: 172S Pennsylvania Ave. CLOSEST CITY: Bremerton ZIP CODE: 98310
DEGREES MINUTES SECONDS METHOD TOWNSHIP RANGE SECTION TAX PARCEL #:
LONGITUDE: 24N 1E 14
LATITUDE:
LEGISLATIVE DISTRICT: 28 CONGRESSIONAL DISTRICT: 6

SITE STATUS INFORMATION:

RESPONSIBLE UNIT: NW NORTHWEST DATE ENTERED: See 22, 1994
SITE MANAGER: NORTHWEST REGION LAST UPDATE DATE: JUL 14, 1995
ECOLOGY STATUS: 2 STATUTE: 2
INDEPENDENT STATUS: PROGRAM PLAN:
WARM RANK: 1 UBAT SITE: X
NFA CODE:

EPA ID: PRELIMINARY ASSESSMENT RATING:
SITE INSPECTION RATING:

ERTS ID: N14321 UBI ID:
LUST ID: APRS PROJECT CODE:

SITE COMMENTS:

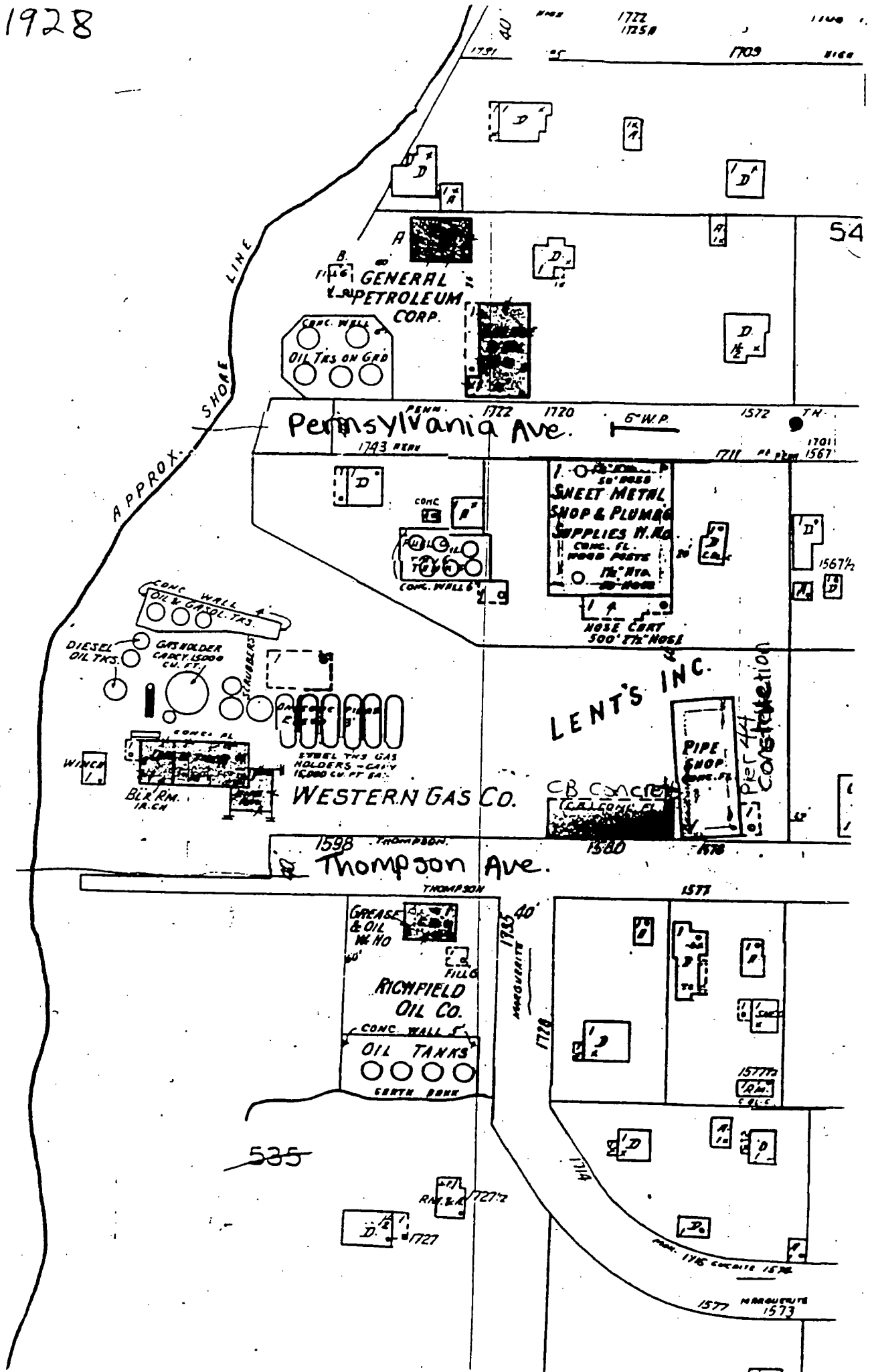
Site "aka" as Penn Plaza Industrial Park & Sesko property. Former coal gasification plant. Currently, unlabeled/uncontained drums, sp

AFFECTED MEDIA & CONTAMINANTS INFO:

MEDIA	STATUS	#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	#13	#14	#15	#16	#17	DWTYPE
1 Groundwater	8	S		S				S	S			S							
2 Surface Water	S	S						S	S			S							
4 Soil	C	C		S				S	C			C							
5 Sediment	C			S								C							

1928

Port Washington Narrows



WORKSHEET 1
SUMMARY SCORE SHEET

Site Name: Old Bremerton Gasworks/Penn Plaza Industrial Park and Sesko properties

Site Location: (City, County, or Section/Township/Range)

Bremerton, Kitsap County, Section 14, Township 24 North, Range 1 East

Site Description: (Include management areas, compounds of concern, and quantities)

The Old Bremerton Gasworks operated during the 1920s as a coal gasification plant. Currently, the Gasworks encompasses the Penn Plaza Industrial park and the adjacent Sesko property. The current land owner of Penn Plaza Industrial Park is Mr. Paul McConkey. Portions of the land have been leased to a variety of tenants over the years. The Sesko Company is located between the Penn Plaza Park and the waters of Port Washington Narrows. It is currently being used as a "Junk yard" for scrap metal, old fuel tanks, vehicles, boats, and other miscellaneous material.

Environmental samples of surface soils and sediments were taken from the Sesko property in March 1995 and analyzed for semi-volatile organics. Results from these samples indicate exceedances of MTCA Method A cleanup levels for many carcinogenic PAHs for industrial soils. PAHs exceeding the Method A cleanup levels that are scored include: benzo(a)pyrene (1,810 mg/kg), benzo(b)fluoranthene (2,720 mg/kg), naphthalene (6,700 mg/kg), and phenanthrene (24,400 mg/kg). PAHs were also detected in adjacent marine sediments.

Except for an area of approximately 20 feet by 60 feet, the entire Penn Plaza site is paved with concrete. Chemical releases are likely to enter the storm drain system and enter the Port Washington Narrows. Chemical releases are assumed to have migrated into the groundwater prior to the pavement of the site. Releases to the air continue to occur as evidenced from the typical PAH odor mentioned by the Ecology inspector, Norm Peck. Thus, hazardous substance pathways are considered via groundwater, surface water, and air. Because the site is predominantly paved, only the unpaved portion was used for estimating quantities of contamination. However, the extent of contamination remains a major uncertainty for this site.

Special Considerations: (Include limitations in site file data, data which cannot be accommodated in the model, but which are important in evaluating the risk associated with the site)

This site hazard assessment was begun for Penn Plaza. After receiving recent sampling results from the adjacent Sesko property, the assessment was extended to the entire property formerly called the Old Bremerton Gasworks. Other property owners may be identified later.

Soils and sediments were sampled from this site by the Department of Ecology in March 1995. The samples were analyzed for semi-volatile compounds and metals. For the purposes of scoring, only the contaminated soils were used. The area of contamination is unknown and may exist in various portions of the properties. However, only the visibly stained soils observed during the site visit were used to estimate the extent of contamination (quantity). The Old Bremerton Gasworks may, in fact, represent a much larger area.

ROUTE SCORES:

Ground Water/Human: 60.3

Overall Rank: 1

Surface Water/Human: 32.7

Air/Human: 57.5

Air/Environmental: NS

Surface Water/Environmental: 42.9

WORKSHEET 2
ROUTE DOCUMENTATION

1. SURFACE WATER ROUTE

List those substances to be considered for scoring:

Source: 1

PAHs including Naphthalene, Phenanthrene, Benzo(b)fluoranthene, and Benzo(a)pyrene

Explain basis for choice of substances to be used in scoring.

Many PAHs were measured in soils on site. These chemicals were selected based on carcinogenicity and toxicity

List management units to be considered in scoring:

Source: 1,2,3

Spill to soils from old gasworks park.

Explain basis for choice of unit used in scoring.

Gasworks operation released contaminants to soil as evidenced by recent data. Unpaved areas drain to storm drains and Puget Sound.

2. AIR ROUTE

List those substances to be considered for scoring:

Source: 1

PAHs Naphthalene, Phenanthrene, Benzolalpyrene, and Benzo(b)fluoranthene.

Explain basis for choice of substances to be used in scoring.

Many PAHs were measured in soils onsite. These were selected based on carcinogenicity and toxicity.

List management units to be considered in scoring:

Source: 1,4

Spills and releases to soils from Old Bremerton Gasworks and continuing releases to air.

Explain basis for choice of unit used in scoring.

Odors noticed during sampling in unpaved area.

3. GROUND WATER ROUTE

List those substances to be considered for scoring:

Source: 1

PAHs including Naphthalene, Phenanthrene, Benzo(a)pyrene, and Benzo(b)fluoranthene.

Explain basis for choice of substances to be used in scoring.

Soil contamination documented. These PAHs selected based on carcinogenicity and toxicity.

List management units to be considered in scoring:

Source: 1,2,3

Spills and releases to soils.

Explain basis for choice of unit used in scoring.

Soils are contaminated with PAHs. Continuing releases are possible in unpaved areas and previous releases from formerly unpaved areas.

**WORKSHEET 4
SURFACE WATER ROUTE**

1.0 SUBSTANCE CHARACTERISTICS

1.1 Human Toxicity

Substance	Drinking Water Std.		Chronic Toxicity		Acute Toxicity		Carcinogenicity Potency		
	(µg/l)	Value	mg/kg/day	Value	mg/kg-bw	Value	WDE	Factor	Value
Benzo(a)pyrene		10		ND		10			7
Benzo(b)fluoranthene		10		ND		ND			7
Napthalene		6		3		5			ND
Phenanthrene		10		ND		ND			ND

Source: 1,5

Highest Value: 10

+ 2 Bonus Points?: 2

Value: 12

**1.2 Environmental Toxicity Based on Fresh Water
Marine pathway <500 ft.**

Source: 1,5 Value: 4

Substance	Acute Criteria (µg/l)	Value	Non-human mammalian acute toxicity (mg/kg)	Value
1		4	50 mg/kg	4
2		4		4
3		2		2
4		2		4

1.3 Substance Quantity 1,200 sq. ft.

Source: 2,6 Value: 6

Explain basis: Observed contamination (soil stains) 20'X 60' Contamination may be more extensive.

2.0 MIGRATION POTENTIAL

2.1 Containment

For area 20'X 60'

Source: 2,6 Value: 10

Explain basis: Spills and discharges to surface soils without runoff/runoff controls.

2.2 Surface Soil Permeability: Sand and gravel

Source: 2 Value: 1

2.3 Total Annual Precipitation: 39"

Source: 7 Value: 3

2.4 Maximum 2-Year 24-Hr Precipitation: 3- 3.5

Source: 6 Value: 3

2.5 Flood Plain: No

Source: 2 Value: 0

2.6 Terrain Slope: 15% (worst portion of site)

Source: 2,6 Value: 5

3.0 TARGETS

3.1 Distance to Surface Water: <500'

Source: 2 Value: 10

3.2 Population Served within 2 miles: None

Source: 8 Value: 0

3.3 Area Irrigated by Sources within 2 miles: None downgradient

Source: 9 Value: 0

3.4 Distance to Fishery Resource: <500'

Source: 2 Value: 12

3.5 Distance to Sensitive Environment: <500'

Source: 2 Value: 12

List: Port Washington Narrows

4.0 RELEASE

Source: 1 Value: 5

Explain basis: Documented sediment contamination.

WORKSHEET 5
AIR ROUTE

1.0 SUBSTANCE CHARACTERISTICS

1.1 Introduction - please review before scoring

1.2 Human Toxicity

Substance	Air Std.		Chronic Toxicity		Acute Toxicity		Carcinogenicity Potency		
	($\mu\text{g}/\text{m}^3$)	Value	mg/kg/day	Value	mg/m ³	Value	WOE	Factor	Value
Benzolalp		10		ND		ND			ND
Benzo(b)f		ND		ND		ND			ND
Naphthalene		4		ND		ND			ND
Phenanthrene		ND		ND		ND			ND

Source: 1,5

Highest Value: 10

+ 2 Bonus Points?: -

Value: 10

1.3 Mobility

Compounds volatile so score is gaseous.

1.3.1 Gaseous Mobility

Vapor Pressure: 1 = 1, 2 = 1, 3 = 3, 4 = 2

Value: 3

Source: 1,5

1.3.2 Particulate Mobility NA

Soil Type:

Erodibility: tons/acre/yr

Climatic Factor:

Particulate Mobility Potential

Source:

Value:

1.4 Final Human Health Toxicity/Mobility Matrix:

Value: 15

1.5 Environmental Toxicity

Cannot score due to lack of animal data.

Source: Value:

Substance	Non-human mammalian acute toxicity (mg/kg)	Value	Mobility (Particulate)	Value

Environmental Toxicity Mobility Matrix

Source: Value: NS

1.6 Substance Quantity

1,200 sq.ft.

Explain basis: Based on observed soil staining.

Source: 1,2 Value: 4

2.0 MIGRATION POTENTIAL

2.1 Containment

Source: 1,6 Value: 10

Explain basis: Soil contamination cover < 2' and no vapor collection

3.0 TARGETS

3.1 Nearest Population: 50 feet

Source: 2 Value: 10

3.2 Nearest Sensitive Environment: 2,000 feet
List: City Park

Source: 12 Value: 6

3.3 Population within 1/2 mile: sq.rt. 5,200 = 72 Estimated based on schools,
hospitals, residences, and commercial businesses

Source: 2,12 Value: 72

4.0 RELEASE

Explain basis: None confirmed.

Source: 4 Value: 0

**WORKSHEET 6
GROUND WATER ROUTE**

1.0 SUBSTANCE CHARACTERISTICS

1.1 Human Toxicity

Substance	Drinking Water Std.		Chronic Toxicity		Acute Toxicity		Carcinogenicity Potency		
	(µg/l)	Value	mg/kg/day	Value	mg/kg-bw	Value	WOE	Factor	Value
Benzolalp		10		ND		10			7
Benzo(b)f		10		ND		ND			7
Naphthalene		6		3		5			ND
Phenanthrene		10		ND		ND			ND

Source: 1,5

Highest Value: 10

+ 2 Bonus Points?: 2

Value: 12

1.2 Mobility (Use numbers to refer to above listed substances)

Cations/Anions: _____

OR

Solubility (mg/l): 1=0, 2=0, 3=1, 4=0

Source: 1,6 Value: 1

1.3 Substance Quantity

Source: 2 Value: 3

Explain basis: 1,200 sq.ft. x assume 3' deep. 20'X 60' contam. soils visible
1200x3 = 133 cu.vds.

27

2.0 MIGRATION POTENTIAL

2.1 Containment

Explain basis: Spills and contaminated soils

Source: 2,6 Value: 10

2.2 Net Precipitation: 24

Source: 7 Value: 3

2.3 Subsurface Hydraulic Conductivity: Gravelly sand > 10⁻³

Source: 10,11 Value: 4

2.4 Vertical Depth to Ground Water: 15-20'

Source: 2 Value: 8

3.0 TARGETS

3.1 Ground Water Usage: Public Supply with alternative sources available

Source: 8 Value: 4

3.2 Distance to Nearest Drinking Water Well: 3,000'

Source: 8 Value: 2

3.3 Population Served within 2 miles: >30,000

Source: 8 Value: 100

3.4 Area Irrigated by Wells within 2 miles: 23 acres = 3.59 = 4

Source: 9 Value: 4

4.0 RELEASE

Source: 1 Value: 0

Explain basis: None observed.

REFERENCES

Site Hazard Assessment

Old Bremerton Gasworks (Penn Plaza and Sesko Properties)

- 1) Huntamer, D., Manchester Environmental Laboratory, Washington Department of Ecology. 1995. Case Narrative on Old Bremerton Gasworks, Case No. 1729-95. May 10, 1995.
- 2) Eldridge, Jim. Science Applications International Corp. (SAIC). Site inspection on May 9, 1995.
- 3) Polayes-Wien, J., Washington Department of Ecology. December 16, 1993. Inspection Letter to Mr. Paul McConkey concerning Penn Plaza Industrial Park and Adjacent Properties. Inspection date July 15, 1993.
- 4) Peck, Norm. 1995. Personal communication with Jim Eldridge, SAIC, May 15, 1995.
- 5) Washington Department of Ecology. 1992. Toxicology Database for Use in Washington Ranking Method Scoring. Publication No. 92-37.
- 6) Washington Department of Ecology. 1990. Washington Ranking Method Scoring Manual. Revised April 1992. Publication No. 90-14.
- 7) Climatological Data for Bremerton, Kitsap County.
- 8) Washington Department of Health. 1994. Public Water Supply Database. Kitsap County.
- 9) Water Rights Information System (WRIS) Database. Washington Department of Ecology.
- 10) Water Well Reports filed with the Department of Ecology:
 - Claude Brookman, Owner. Kitsap County, SW 1/4, NE 1/4, Sec. 17, T24N, R1E. Completed December 11, 1989. Depth of completed well-333 feet.
 - Robert Ryle, Owner. Kitsap County, SE 1/4, NW 1/4, Sec. 17, T24N, R1E. Completed July 12, 1976. Depth of completed well-317 feet.
 - Hanna Ford, Owner. Kitsap County, NE 1/4, NW 1/4, Sec. 17, T24N, R1E. Completed July 26, 1985. Depth of completed well- 163 feet.
- 11) Freeze, R.A. and J.A. Cherry. 1979. Groundwater. Prentice-Hall, Inc. New Jersey.
- 12) U.S. Geological Survey. 1981. Bremerton West Quadrangle Washington - Kitsap Co. 7.5 Minute Series (Topographic). Photorevised 1981.

APPENDIX F

EPA PCB — Guidance Document

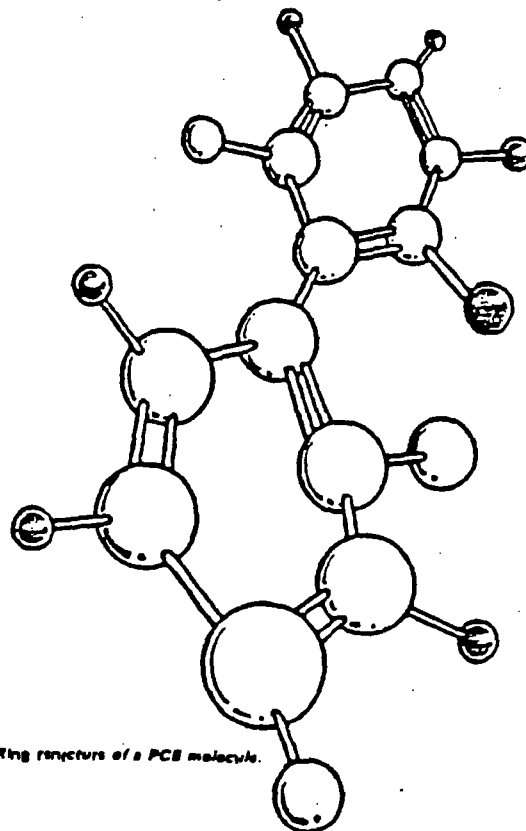
EPA PCBs in Fluorescent Light Fixtures

A Fact Sheet



Introduction

The purpose of this brochure is to provide some basic information on polychlorinated biphenyls (PCBs) and guidelines for handling PCBs in fluorescent light fixtures. Although the precautionary actions described in this fact sheet may seem extreme, or suggest to some that cleanup of a small PCB spill is personally hazardous, this is not generally so. For example, if you should get a small amount of PCB on your skin during cleanup, it is highly unlikely that you would be harmed. However, given the nature of PCBs and the fact that much is still unknown about the effects of minor exposures, no absolute guarantees or reassurances can be given. For that reason, EPA has chosen to describe a conservative approach which minimizes personal hazard. It is EPA's hope that this information will inform you rather than alarm you.



Ring structure of a PCB molecule.

What Are PCBs?

PCBs (polychlorinated biphenyls) belong to a broad family of organic chemicals known as chlorinated hydrocarbons. PCBs are produced by the combination of one or more chlorine atoms and a biphenyl molecule. Virtually all PCBs in existence today have been synthetically manufactured.

PCBs range in consistency from heavy oily liquids to waxy solids. Prior to 1979, PCBs were widely used in electrical equipment such as transformers, capacitors, switches, and

voltage regulators for their "cooling" properties because they do not readily burn or conduct electricity, and only boil at high temperatures. Also, PCBs do not readily react with other chemicals. They were also used in mining equipment, heat transfer and hydraulic systems, carbonless copy paper, pigments, and microscopy mounting media.

Why Are PCBs Harmful to Human Health and the Environment?

When released into the environment, PCBs do not easily break apart and form new chemical arrangements (i.e., they are not readily biodegradable). Instead, they persist for many years, bioaccumulate, and bioconcentrate in organisms. Laboratory data show that PCBs cause cancer in animals. Although there are no actual data showing that PCBs cause cancer in humans, EPA's policy is to consider any animal carcinogen a possible human carcinogen. Animal studies show adverse reproductive and developmental effects from repeated exposure to PCBs. In addition, it has been shown that PCBs are toxic to fish at very low levels of exposure. The survival rate and the reproductive success of fish can be adversely affected by the presence of PCBs. EPA believes there may be similar causes for concern when humans are exposed to large doses of PCBs. Exposure to PCBs can cause chloracne (a painful, disfiguring skin illness), nausea, dizziness, eye irritation, and bronchitis. Ingestion of PCBs can cause liver damage and digestive problems.

How Does EPA Regulate PCBs?

EPA regulates PCBs through rules issued pursuant to the Toxic Substances Control Act of 1976. These regulations generally control the use, marking, storage, records, and disposal of PCBs. There are millions of pieces of equipment in operation in the U.S. which were manufactured prior to these regulations and which contain PCBs.

Small Capacitors in Fluorescent Light Ballasts

Light ballasts are the primary electric components of fluorescent light fixtures and are generally located within the fixture under a metal cover plate. The ballast units are generally composed of a transformer to reduce the incoming voltage, a small capacitor (which may contain PCBs), and possibly a thermal cut-off switch and/or safety fuse. These components are surrounded by a tar-like substance that is designed to muffle the noise that is inherent in the operation of the ballast. This substance covers the small capacitor. When a ballast unit fails, excessive heat can be generated which will melt or burn the tar material, creating a characteristic foul odor.

In considering causes of ballast failure, some privately conducted tests have indicated that operation of power-saving lamps with a standard ballast or standard lamps with a power-saving ballast tends to significantly increase the ballast operating temperature and decrease its normal life span. It appears that ballasts will fail less frequently if standard



This is the ballast portion of a typical fluorescent light fixture.

saving lamps with power-saving ballasts. Fluorescent lamps should be changed in pairs; new lamps should not be used with old lamps.

Does Your Fluorescent Light Ballast Contain PCBs?

Before EPA banned the manufacture of PCBs in 1978, PCBs were used in the manufacture of fluorescent light ballasts. The use of PCBs in ballasts manufactured prior to 1973 is not regulated by EPA. All light ballasts manufactured since 1978 which do not contain PCBs should be marked by the manufacturer with the statement "No PCBs." For those manufactured prior to that time, or for those ballasts which contain no statement regarding PCB content, you should assume that they do contain PCBs.

If the ballast does contain PCBs, they are located inside the small capacitor. There would be approximately 1 to 1½ ounces of PCB fluid in the capacitor itself. If the ballast falls, the capacitor may break open, allowing the PCB oil to drip out of the fixture. The capacitor does not always leak when the ballast falls, but when it does happen, measures should be taken to limit or avoid personal exposure.

What Should I Do if My Light Ballast Leaks?

fluorescent light ballast leaking PCBs:

1. Vacate the room or area immediately and open any windows to ventilate the room to the outside. If the incident occurred in a room which cannot be vented, the person replacing the failed ballast and cleaning up can reduce exposure by wearing a chemical cartridge respirator equipped with an organic vapor cartridge.



Once you have removed the fluorescent tubes and the control cover, you will be able to easily locate the ballast(s). Note the gloves and goggles worn to prevent possible personal contact with PCBs.

2. Turn off the light fixture at the switch and disconnect electricity at the fuse or breaker box. Let the ballast unit cool for 20-30 minutes before proceeding.

If the room is fully ventilated, the amount of PCB-contaminated particulate matter in the air should decrease significantly enough to make negligible any risk from breathing.

3. Wear rubber gloves that will not absorb PCBs (e.g., neoprene, butyl, or nitrile). Further, if you will be working directly under the fixture, consider using additional protective gear such as a respirator.

further leaking or cleanup activities. Exercise caution to avoid personal contamination (e.g., from touching your face with a contaminated glove).

During the cleanup or removal period, smoking should be prohibited in the area because smoking increases the inhalation rate of contaminated air. In addition, you may be using a flammable solvent in the cleanup.

4. Remove the fluorescent lamps.
5. Recheck that the power is off at the fuse or breaker box. Remove the metal cover over the wiring and ballast unit; loosen the ballast unit by taking out the metal screws which held it to the end of the fixture; cut the electrical wires going to the ballast and remove the ballast.
Note: Wire connectors can be used when installing a new ballast.
6. Proceed to clean up leaks using the following guidelines.

PCBs that leak onto nonabsorbent surfaces such as table tops and uncarpeted floors should first be cleaned up by wiping with a rag or paper towel or by scraping with a putty knife if hardened. Avoid smearing the PCB around. This would only contaminate a larger area. Surfaces should then be thoroughly cleaned twice using an appropriate solvent or detergent. Only certain solvents are effective in cleaning up spilled PCBs. These include mineral spirits, deodorized kerosene, turpentine, and rubbing alcohol. Certain detergents containing trisodium phosphate (such as "Soilax" or "Spic 'n Span") may also be used. However, they should be used only at full strength and applied with a damp rag rather than diluted in a bucket. That solution would become contaminated and cannot legally be disposed of in the sewer system. Some of the other effective detergent products (which are commercially available) include: "Triton X-100" (Rohm-Haes), "Srerex" (Monsanto), and "Power Cleaner 155" (Penetone Corp.). EPA does not endorse these particular products. Other effective products may also be available.

For leaks onto absorbent materials such as drapes and carpets, there is no reliable way to clean and decontaminate the material. In the case of rugs and fabrics, the material should be cut away in a six-inch radius around the contamination point(s). In areas where the leak is off the ground,

disposed of. Proper disposal procedures for all such materials are described in the following section. Associated surfaces, such as flooring under contaminated carpeting, should be thoroughly cleaned with a solvent or detergent as previously described.

7. Contaminated materials (ballasts, rags, contaminated clothing, gloves, drapes, carpets, etc.) should be packed into crumpled newspapers or other absorbent materials (sawdust, kitty litter, vermiculite, soil, etc.) and placed in a double thickness plastic bag. This bag should be taken to one of the transporters listed in the following section of this fact sheet. There, the contaminated materials will be packed in a drum approved for PCBs by the Department of Transportation and finally disposed of at an EPA approved site.

(One might consider discarding the entire light fixture instead of decontaminating the unit. This would eliminate the chance of skin coming into direct contact with the PCBs while cleaning inside the light fixture.)

8. When you are completely through with the cleanup process, and contaminated materials and protective clothing have been packed for disposal, you should wash your hands thoroughly with detergent.

9. Continue to ventilate the room for 24 hours before reuse.

How to Get Bid of Your PCBs

Arrangements may be made with one of the following Seattle area transporters for shipment of ballasts, PCB-soiled items, or fluorescent fixtures containing PCBs to an EPA-approved chemical waste processing site. You may wish to call more than one transporter to compare prices. If you live outside of the Seattle metropolitan area, please check the telephone yellow pages under waste disposal to locate an authorized transporter. If you have difficulty finding a transporter, please call EPA's regional office in Seattle at (206) 442-1270.

1. Chemical Processors, Inc.
(206) 757-0250
2. Northwest Tank Service
(206) 622-1090
3. Crosby and Overton
(206) 672-8030 (24-hour number)
4. Wetlinghouse
(206) 232-4111

For homeowners within the Seattle metropolitan area, small numbers (less than 5) of non-leaking fluorescent light ballasts can be dropped off at one of four collection

points maintained by the Seattle-King County Health Department. Appointments must be made beforehand. Leaking units will not be accepted. The numbers to call for these centers are:

Eastside (Bellevue area)	885-1278
Southeast (Renton area)	228-2620
North (Northgate area)	353-1765
Central (downtown area)	557-2722

The Seattle-King County Health Department will make arrangements to have the ballasts collected at these centers shipped to an EPA-approved chemical waste landfill for PCBs.

For further information, please contact EPA Region 10 at (206) 442-1270.

January 1985

APPENDIX G

AHERA Certification Documents

Certificate of Training

J&J Associates is pleased to certify that

Don W. Spencer

has attended and successfully completed the

AHERA MANAGEMENT PLANNER REFRESHER

in accordance with

40 CFR Part 763, Subpart E, Appendix C

on this 8th day of April, 1997

at Seattle, Washington

Valid through April 8, 1998


COURSE INSTRUCTOR


TRAINING DIRECTOR

J&J970408-MPR-03

ACCREDITATION NO.

J&J ASSOCIATES

550 NW Fairwood Way

Brennerton, Washington 98311

(360) 731-6015

Certificate of Training

J&J Associates is pleased to certify that

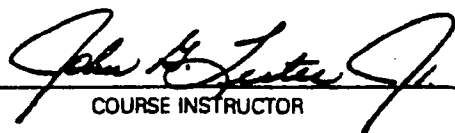
Don W. Spencer

has attended and successfully completed the

AHERA BUILDING INSPECTOR REFRESHER

in accordance with
40 CFR Part 763, Subpart E, Appendix C
on this 8th day of April, 1997
at Seattle, Washington

Valid through April 8, 1998


COURSE INSTRUCTOR


TRAINING DIRECTOR

J&J970408-BIR-03

ACCREDITATION NO.

J&J ASSOCIATES
550 NW Fairwood Way
Bremerton, Washington 98311
(360) 731-6015

Certificate of Training

J&J Associates is pleased to certify that

Dave Holmes

has attended and successfully completed the

AHERA BUILDING INSPECTOR REFRESHER

in accordance with
40 CFR Part 763, Subpart E, Appendix C
on this 17th day of October, 1996
at Bellevue, Washington

Valid through October 17, 1997

Paul W. Jackson
COURSE INSTRUCTOR

John H. Luster Jr.
TRAINING DIRECTOR

J&J961017-BIR-07

ACCREDITATION NO.

J&J ASSOCIATES
550 NW Fairwood Way
Bremerton, Washington 98311
(360) 731-6015